

EXHIBIT 29

**Deposition of Angelica Paulo
(Former Frontier ground handling supervisor, as WFS employee)**

(Redacted)

ANGELICA PAULO
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

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1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF NEVADA

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PETER DELVECCHIA, et al.,

7

Plaintiffs,

8

vs.

CASE NO. 2:19-CV-01322-KJD-DJA

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FRONTIER AIRLINES, INC.,

et al.,

10

Defendants.

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14

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF

16

ANGELICA PAULO

17

18 March 15, 2022

19

10:06 a.m.

20

21 Las Vegas, Nevada

22

23

Reported By: Robin A. Ravize, CCR #753  
NV Firm Lic. #008F

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ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

2

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3 Minor:

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23 Also Present:

24 LAURA VELASCO, Remote Videographer

25

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

3

1 INDEX OF EXAMINATION

2 WITNESS: Angelica Paulo

| 3 EXAMINATION  | PAGE         |
|----------------|--------------|
| 4 By Mr. McKay | 6, 82, 108   |
| By Mr. Maye    | 62, 106, 111 |

5

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ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

4

## 1 INDEX TO EXHIBITS

| 2 Plaintiffs' | 3 Description                                                                                                                                                          | 4 Page |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 5 Exhibit 1   | 6 Passenger PNR Details for E95Z4G<br>7 of Frontier Airlines<br>8<br>9<br>10<br>11<br>12<br>13<br>14<br>15<br>16<br>17<br>18<br>19<br>20<br>21<br>22<br>23<br>24<br>25 | 25 61  |
|               | (Original Exhibit 1 has been<br>attached to the original<br>transcript.)                                                                                               |        |

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

5

1 LAS VEGAS, NEVADA

2 TUESDAY, MARCH 15, 2022; 10:06 A.M.

3 -00o-

4 THE REPORTER: My name is Robin Ravizé, a Nevada  
5 certified shorthand reporter, and this deposition is being  
6 held via videoconferencing equipment.

7 Counsel off the record have expressed their  
8 agreement that this deposition may take place with the  
9 remote administration of the oath and remote reporting of  
10 the deposition.

11 \* \* \* \*

12 THE VIDEOGRAPHER: Good morning. We are now on the  
13 record, and the time is 10:06 a.m. Pacific time on  
14 March 15th, 2022. This begins the videoconference  
15 deposition of Angelica Adrineda Paulo. And this is taken in  
16 the matter of Peter DelVecchia versus Frontier Airlines,  
17 Inc., et al. And this is filed in the United States  
18 District Court for the District of Nevada, case number  
19 2:19-CV-01322-KJD-DJA.

20 My name is Laura Velasco and I'm the remote  
21 videographer today. Our court reporter is Robin Ravize, and  
22 we are from Esquire Deposition Solutions.

23 Will everyone present, can you please state  
24 your name and who you represent, after which our court  
25 reporter will swear in the witness.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

6

1 MR. MCKAY: My name is John McKay and I represent  
2 the DelVecchias who are the plaintiffs.

3 MR. TITOLO: Tim Titolo, Nevada co-counsel for the  
4 plaintiffs.

5 MR. MAYE: Brian Maye for the defendants.

6  
7 ANGELICA PAULO,  
8 having been first duly sworn,  
9 was examined and testified as follows:

10  
11 EXAMINATION

12 BY MR. MCKAY:

13 Q. Thank you.

14 Good morning, Ms. Paulo. How are you today?

15 A. Good. How are you?

16 Q. Good, thanks.

17 Have you ever been to a deposition before?

18 A. Never.

19 Q. So I will spend a few minutes just telling  
20 you what's going on. And don't feel like you have to  
21 memorize everything. We will help you along as we proceed.

22 If you need to do something different, we  
23 will tell you. But this is kind of a hybrid of an in-court  
24 and an out-of-court proceeding. In the old days before the  
25 pandemic, this would occur at a court reporter's office or a

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

7

1 lawyer's conference room. And we would all be sitting  
2 around at a big conference room table.

3 But now circumstances being what they are, we  
4 are doing it by zoom. But the concept is the same.

5 We are taking down your deposition testimony  
6 as though you were sitting in a courtroom in a witness  
7 stand, and it's like a court proceeding in that respect  
8 because at some point in the future even though there's no  
9 judge present today, a judge will probably read the  
10 transcript or watch the videotape.

11 And for that judge, he will be -- and they  
12 are both male in this case -- they will be looking at your  
13 testimony precisely as though you were sitting in their  
14 courtroom testifying.

15 And so they understand if you've been placed  
16 under oath, then they expect you to testify as though you  
17 were placed under oath in a courtroom.

18 Is that understood?

19 A. Understood.

20 Q. Okay.

21 And it's not like a courtroom in the sense  
22 that if someone rings your doorbell and you have to go let  
23 them in, or if your phone rings or the dog wants to go out,  
24 you can certainly tell us and that's fine. We can take a  
25 few minutes off the record.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

8

1                   Just be sure -- we do ask that if there was a  
2 question pending, that you go ahead and close the loop by  
3 answering the question before we take a break, okay?

4                   A.        Okay.

5                   Q.        And then a couple little things that -- this  
6 is the part that we will remind you about so you don't have  
7 to memorize it.

8                   But for one thing, the court reporter is  
9 taking down every word that is said, including what I'm  
10 saying right now. And one thing that really messes her up  
11 is if we both talk over each other.

12                  So even though that's pretty normal in a  
13 conversational setting, we have to be a little bit formal  
14 here and wait until the other person is finished talking  
15 before we begin our response; is that okay?

16                  A.        Understood.

17                  Q.        And you're doing a very good job of this so  
18 far. But just be sure that as we get further into things  
19 that you don't answer things with an uh-huh or a nod of the  
20 head because that's very difficult for the court reporter to  
21 transcribe, all right?

22                  A.        Understood.

23                  Q.        Any time you don't understand what I'm  
24 asking, just say so. And I will either explain it or I'll  
25 rephrase the question, or I'll maybe drop it entirely.

1 A. Okay.

2 Q. So just let me know.

3 If you do answer a question, we will all  
4 assume that you understood it.

5 A. Okay.

6 Q. So with that said, let me just get all of the  
7 housekeeping done.

8 Are you at in  
9 Henderson, Nevada?

10 A. Correct.

11 Q. Do you have any plans to move from there in  
12 the near future?

13 A. No, sir.

14 Q. Okay.

15 The reason I'm asking that question is that  
16 we may need to have your testimony at the actual trial. And  
17 if we do, we need to know where to find you.

18 A. Okay.

19 Q. Is there anybody else that lives at that  
20 address?

21 A. Yes.

22 Q. Is that your fiance?

23 A. Yes.

24 Q. And what is his name?

25 A. Ricky Craig.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

10

1 Q. And it sounds like -- from the discussion off  
2 the record before we started, it sounds like you will be  
3 Mrs. Craig at some point in the near future; is that  
4 right?

5 A. In a couple of weeks, yes.

6 Q. Okay. Great. Congratulations.

7 A. Thank you.

8 Q. How are you currently employed, if at all?

9 A. Okay.

10 I'm not currently employed.

11 Q. What I'm going to be asking you about today  
12 is your former employment at Worldwide Flight Services here  
13 in Nevada.

14 A. Okay.

15 Q. So when were you first employed by  
16 Worldwide?

17 A. Back in 2008.

18 Q. Okay.

19 Do you remember the month?

20 A. August.

21 Q. Okay.

22 And just for the court reporter's benefit, I  
23 just want to clarify. Worldwide for this particular company  
24 is two words; is that correct?

25 A. No. Worldwide is one word.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

11

1 Q. Oh, okay. You need to tell whoever runs  
2 their website, I think it shows up as two.

3 But in any event, maybe I'm wrong. Somewhere  
4 along the way, I saw it as two. Let me just see. No, I'm  
5 wrong. It says Worldwide is one word.

6 Well, I'm frequently wrong, so nothing new  
7 about that.

8 So in 2008, you started at Worldwide Flight  
9 Services. And what were you doing at that time for them?

10 A. I was a service representative for an  
11 airline, AirTran Airways.

12 Q. And what did that entail?

13 A. Just a typical check-in of the passengers,  
14 boarding --

15 Q. Okay.

16 A. -- (inaudible.)

17 Q. Go ahead. What were you saying it  
18 involved?

19 A. Oh, check in passengers, boarding and baggage  
20 claim as well.

21 Q. So basically, was that everything from the  
22 point where they arrived at the airport until they got on  
23 the plane?

24 A. Yes, sir.

25 Q. And then if they were arriving at the

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

12

1       airport, then it involved getting their baggage as well?

2           A.     Correct.

3           Q.     How did you find out -- once you got hired,  
4 how did you find out how that was to be done?

5           A.     We had training, formal training in Atlanta,  
6 Georgia.

7           Q.     And who conducted that training?

8           A.     It was AirTrans, AirTrans employees, yes.

9           Q.     So you, as a Worldwide employee, traveled to  
10 AirTran and AirTran trained you to do what they wanted you  
11 to do; is that right?

12          A.     Correct, yes.

13          Q.     And at any time did your position change at  
14 Worldwide?

15          A.     Yes.

16          Q.     And when was that?

17          A.     When AirTran Airways was bought out with  
18 Southwest, I was laid off at the time. I then shortly  
19 became a dispatcher for their crew shuttle service with  
20 Worldwide.

21                   And about a year after that, I came on as the  
22 Frontier supervisor.

23          Q.     And when you say "their crew shuttle," whose  
24 crew shuttle was that?

25          A.     Worldwide Flight Services.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

13

1 Q. And is that a service that they do to move  
2 airline employees around?

3 A. That is correct.

4 Q. So I don't think we need to get into too many  
5 details about the crew shuttle. But what did you do to  
6 become the supervisor for Frontier?

7 Did you have to make an application for that  
8 job?

9 A. My manager at the time had requested that I  
10 accept the position.

11 Q. Oh, okay.

12 And who was your manager?

13 A. Cassie Guillory.

14 Q. Do you know how Guillory spelled, by any  
15 chance?

16 A. G-u-i-l-l-o-r-y.

17 Q. Thank you.

18 So when Ms. Guillory told you about the  
19 position with Frontier or for Frontier, was Frontier a new  
20 client for Worldwide at that time?

21 A. Not entirely new, but fairly new. It must be  
22 maybe a year or two. Maybe just a year since they acquired  
23 the contract.

24 Q. Do you remember what month and year you took  
25 the position as the supervisor?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

14

1           A.       I don't remember the year, to be completely  
2 honest.

3           Q.       Okay. That's fine. Maybe we can get at it  
4 this way.

5                     Do you remember how long you worked with  
6 AirTran?

7           A.       Four years.

8           Q.       And you were the dispatcher for the crew  
9 shuttle for --

10          A.       One year.

11          Q.       So roughly speaking then, it was about five  
12 years after August 2008?

13          A.       Roughly.

14          Q.       Okay.

15                     So sometime around the middle of 2013?

16          A.       Give or take.

17          Q.       So let's talk about your introduction to the  
18 Frontier way of doing things.

19                     How did you get trained for that?

20          A.       Initially, I shadowed the current  
21 supervisor.

22          Q.       Okay.

23                     And who was the current supervisor then?

24          A.       My apologies. I can't remember her last  
25 name. I want to say her first name was Jessica.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

15

1                   If you'll allow me some time, I could  
2 probably look her up. I think it was Jessica Esteban.

3                   Q.        Okay. Let's go with that. It's not that  
4 important that we get the name exact.

5                   But I just wanted to go through more of the  
6 process.

7                   So was Jessica then showing you how Jessica  
8 had been trained?

9                   A.        She was showing me the ropes as far as how  
10 the operation ran.

11                  Q.        Okay.

12                  A.        Shortly after -- they were in the middle of  
13 transitioning systems, check-in systems. So I was initially  
14 told not to learn it until they got the new system.

15                  And then from there, I was trained by one of  
16 their trainers.

17                  Q.        Do you remember what the name of the new  
18 system was?

19                  A.        The new system?

20                  Q.        Yes. Was it Navitaire?

21                  A.        Navitaire.

22                  Q.        I think that's N-a-v-i-t-a-i-r-e; is that  
23 right?

24                  A.        It sounds about right, yes.

25                  Q.        Okay.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

16

1                   Did you attend a Frontier-run training for  
2 your job?

3                 A.     Run training?

4                 Q.     Well, like you did with AirTran, did you do a  
5 similar thing with Frontier in Denver?

6                 A.     I was not flown out for training. Trainers  
7 typically come to the station to train the agents there.

8                 Q.     Oh, okay.

9                   So the trainers came from Frontier's offices  
10 in Denver?

11                A.     I couldn't tell you exactly where the offices  
12 were. I'm assuming it was Denver, but I'm not sure.

13                Q.     But you knew that they were Frontier  
14 employees?

15                A.     Correct.

16                Q.     Okay.

17                   And what sort of training did these Frontier  
18 employees provide to you?

19                A.     Just how to work the system. And we also  
20 have online training, too. I don't know if that's ...

21                Q.     Yeah. That's important.

22                   What type of -- can you describe to us the  
23 online trainings that you had?

24                A.     A lot of videos, questionnaires at the end,  
25 things like that.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

17

1 Q. Okay.

2 And were those created by Frontier?

3 A. Yes.

4 Q. Was it important to know how things were done  
5 by Frontier so that you could do them in place of Frontier's  
6 employees?

7 A. Yes, of course.

8 Q. Okay.

9 So what did the position entail then as  
10 supervisor for the Frontier account at Las Vegas?

11 A. What does it entail?

12 Q. What if you had to describe to somebody what  
13 you did, what would you have said?

14 A. Just to ensure that the operation was run  
15 smoothly; advise the agents where to go, what to do, things  
16 like that.

17 Q. And when you say "the agents," what were the  
18 agents doing?

19 I mean, was it the same thing you described  
20 for AirTran, basically?

21 A. Yes. Check in, go to the gates. That's  
22 it.

23 Q. So just to sort of break it down for someone  
24 trying to understand this, assuming a passenger has bought a  
25 ticket for a Frontier flight and takes a taxi to the

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

18

1       airport, that passenger is going to go to the Frontier  
2       check-in counter, right?

3           A.       Correct.

4           Q.       And that would be staffed by people under  
5       your supervision?

6           A.       Correct.

7           Q.       And then you yourself were under supervision  
8       by Frontier, right?

9           A.       Correct.

10          Q.       Now, do you remember who at Frontier was  
11       supervising you?

12          A.       At that time?

13          Q.       Yes.

14          A.       At the very beginning, we did not have a  
15       Frontier manager there at that time.

16          Q.       Okay. Did you at some point later?

17          A.       Yes.

18          Q.       Do you remember when that started?

19          A.       I cannot recall when he joined Las Vegas. My  
20       apologies. I don't remember.

21          Q.       Oh, that's correct. Okay.

22                   What we are involved in with respect to the  
23       lawsuit is something that happened on the 28th of March of  
24       2019.

25                   Would it be fair to say that the manager from

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

19

1 Frontier was in place by then?

2 A. Yes.

3 Q. And do you remember what his name was?

4 A. Eric -- his name is very difficult.

5 Srangsriwong.

6 Q. Do you know how it's spelled?

7 A. I don't. I'm sorry.

8 Q. Is there anything you could do to help the  
9 court reporter out?

10 A. I could try to look him up.

11 Q. Okay. Take your time.

12 A. Okay.

13 MR. MAYE: I found the spelling.

14 MR. MCKAY: Oh, okay.

15 MR. MAYE: It's S-r-a-n-g-s-r-i-w-o-n-g.

16 MR. MCKAY: Okay. Great. Thank you, Brian.

17 BY MR. MCKAY:

18 Q. We will just call him "Eric," if that's all  
19 right.

20 So Eric then had an office at Las Vegas  
21 airport and was on-site full-time?

22 A. Yes.

23 Q. And his responsibilities were to make sure  
24 that the operation that you were running was being run to  
25 Frontier's standards?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

20

1 A. Yes.

2 Q. So we started off with the fictitious  
3 passenger who arrives by taxi and goes to the counter. Then  
4 that person would check in and get a boarding pass, if they  
5 hadn't already gotten one online; is that right?

6 A. Correct.

7 Q. And that would involve interaction with  
8 somebody who worked under you?

9 A. Correct.

10 Q. And they might check a bag. And if so,  
11 somebody who worked under you would take care of the bag; is  
12 that right?

13 A. Correct.

14 Q. And then they would go to their gate through  
15 security. And once they arrived at the gate, there would  
16 also be employees who you supervised working the gate,  
17 right?

18 A. Correct.

19 Q. And all of these people, did they wear some  
20 kind of uniform?

21 A. Yes.

22 Q. And what did the uniform say as to what  
23 company was displayed?

24 A. Frontier.

25 Q. Frontier, okay.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

21

1                   Did Frontier supply those uniforms?

2       A.       Yes. I want to say, yeah, they did.

3       Q.       And the gates that you worked at, were those  
4       gates that were leased by Frontier from the airport?

5       A.       Mostly leased, yes.

6       Q.       And the counter space as well was something  
7       that Frontier had arranged for with the airport?

8       A.       Yes.

9       Q.       Okay.

10                  So there really wasn't any way to do your job  
11       without using Frontier's locations at the airport, was  
12       there?

13       A.       Correct.

14       Q.       Do you know whether there was a written  
15       contract between Frontier and your company?

16       A.       I mean, I would assume so. However, I've  
17       never physically seen a written contract.

18       Q.       Did you ever, for instance, get e-mails or  
19       memos that referenced it?

20       A.       No, I don't recall.

21       Q.       That's fine.

22                  How many flights a day did your company  
23       handle for Frontier?

24       A.       It varies. Towards the end, it might have  
25       been roughly around 30, 40 flights a day. When they first

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022  
22

1 started, it was completely different.

2 Q. So by the time of March 2019, basically how  
3 many hours a day did your company provide services to  
4 Frontier?

5 A. How many hours a day? I couldn't tell you  
6 how many hours, to be honest. I don't recall.

7 Q. Was it pretty much a full day?

8 A. Yes, yes. We were typically running a  
9 full-day operation. Counters typically opened around, I  
10 want to say 4:00 in the morning, depending on when the first  
11 flight is, to about -- our last flight is about 1:00, 1:30  
12 in the morning, sometimes 2:00.

13 Q. So just a couple of hours' break in between,  
14 essentially?

15 A. Yeah.

16 Q. And did Frontier provide the signage that  
17 went over the check-in counter and around the gate areas?

18 A. Yes, they did.

19 Q. So the scheduling that you did, that was all  
20 based on how Frontier scheduled its flights in and out of  
21 Las Vegas?

22 A. Correct.

23 Q. If you hired a new person to work under you,  
24 did you have to go and find somebody who had already been  
25 trained?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

23

1           A.       No, not initially. For customer service they  
2 go through about a two-week training with the Frontier  
3 trainer.

4           Q.       Oh, with the Frontier trainer. Oh, okay.

5                   So a person could be hired with no skills,  
6 and then they would be trained by Frontier, and then they  
7 would arrive to work for you?

8           A.       Yes.

9           Q.       Okay.

10                  And that was all training on Frontier's  
11 policies and procedures?

12           A.       Yes.

13           Q.       How was -- let's start with you.

14                  How was your pay computed? Were you on a  
15 salary? Were you working hourly or what?

16           A.       I was salary.

17           Q.       Okay.

18                  How about people that worked for you? Were  
19 they hourly?

20           A.       Hourly.

21           Q.       So the compensation was never, for example,  
22 by the task?

23                  For instance, you know, you get 47 people  
24 onto a certain flight, we will pay you; it wasn't like that,  
25 was it?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

24

1 A. No, it wasn't like that.

2 Q. It was by the clocking in and clocking out  
3 number of hours in between?

4 A. Correct.

5 Q. And when you were salaried, was that on the  
6 basis of long-term contracts? What was your contract like  
7 with Worldwide?

8 A. What do you mean?

9 Q. When you took the job as supervisor, was  
10 there a contract with a certain number of years, or was it  
11 just a contract for as long as it was working out for both  
12 of you?

13 A. The latter.

14 Q. Did there ever come a time when you had to  
15 fire anybody?

16 A. Several times, yes.

17 Q. And what sort of things -- I don't want to  
18 get into anybody's names or anything. But what sort of  
19 things caused somebody to be fired?

20 A. A majority of the time, attendance issues,  
21 performance issues, unprofessional, things like that.

22 Q. And was there input from Eric about any of  
23 that?

24 A. He does not typically have any input as far  
25 as hiring and firing employees. Very rarely. Maybe less

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

25

1 than a handful will he suggest that employees should no  
2 longer be working that counter.

3 Q. But he did have that power, if he wanted to  
4 exercise it?

5 A. Of course.

6 Q. To your understanding, did customers who came  
7 to the airport think that you and your employees were  
8 working for Frontier?

9 MR. MAYE: Object to form.

10 THE WITNESS: I'm sorry?

11 BY MR. MCKAY:

12 Q. Let me ask it a different way.

13 You know, I didn't explain that part. I left  
14 that out. Since there's no judge here, Mr. Maye might make  
15 objections. And if he asks you questions, I might make  
16 objections.

17 And it's completely bizarre because nothing  
18 happens to the objections. They just get written down. And  
19 at some point in time, the lawyers might ask the judge to  
20 rule on the objections. But that's based entirely on the  
21 transcript.

22 So because there's not a judge here, nobody  
23 pounds a gavel and says "Sustained" or "Overruled" or  
24 anything. We just go on as though the objection hadn't been  
25 made.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

26

1                   But since he did object to the way I phrased  
2 the question, I'm going to rephrase it.

3                   You sometimes interacted with employees in  
4 your role, didn't you?

5                  A.       Yes.

6                  Q.       Did the employees you interacted with think  
7 that you were a Frontier employee ever?

8                  A.       My employees?

9                  Q.       No, no.

10                  When you interacted with a passenger, a  
11 Frontier passenger, did the Frontier passengers often think  
12 that you were a Frontier employee?

13                  A.       Yes.

14                  Q.       Was it routine for you to tell them that you  
15 weren't?

16                  A.       No.

17                  Q.       And as far as the people who worked under  
18 you, for instance, at the check-in counter, as far as you  
19 knew, did people think they were Frontier employees?

20                  A.       As far as I know, the passengers assumed we  
21 were Frontier employees, correct.

22                  Q.       Let me go on to the reservation system, the  
23 Navitaire system. And before I get into the Navitaire  
24 details, was there any other Frontier software that any of  
25 your employees worked with?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

27

1           A.       Navitaire was the main one. NetTracer, I  
2 want to say, is a different system.

3           Q.       Is that the baggage --

4           A.       The baggage service.

5           Q.       Anything else?

6           A.       There is. I just cannot remember. It's an  
7 internet system, basically. I can't remember the name of it  
8 right now.

9           Q.       What about the complaint software that they  
10 call Right Now Technology where, if a customer makes a  
11 complaint, it's logged into this software program?

12                  Did you have any access to something like  
13 that?

14           A.       I don't recall that, no.

15           Q.       If a customer made a complaint about  
16 anything, really, involving their travel, how did you  
17 communicate that complaint to Frontier?

18           A.       Typically Frontier requests that all  
19 complaints are called in. A customer would call it into the  
20 Frontier call center.

21           Q.       I see.

22                  So if somebody informed you that they were  
23 unhappy about something, would you then give them the phone  
24 number for the call center?

25           A.       After listening to their issue, yes. I would

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

28

1 also document what they say under their reservation as  
2 well.

3 Q. Oh, okay.

4 So you would put it into the Navitaire  
5 system?

6 A. Correct.

7 Q. So who could read that? Once you put  
8 something into the Navitaire system for a passenger, who is  
9 the audience that could potentially read that?

10 A. I guess any employee who would sign in would  
11 have access to that.

12 Q. And would that also include other Worldwide  
13 employees that were working for Frontier?

14 A. Correct.

15 Q. Okay.

16 A. It's our way to communicate with --

17 Q. I'm sorry. Go ahead and finish.

18 A. I said that's one way to communicate with  
19 each other so that we know what the story is before the  
20 customer even gets to us.

21 Q. Okay.

22 So you could find out about the background on  
23 a customer by looking in the Navitaire system?

24 A. Correct.

25 Q. And I assume that -- or I don't know. But

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

29

1 does Worldwide have contracts with Frontier at other  
2 airports?

3 A. Yes. A few. I can't remember which ones  
4 they are.

5 Q. And I forgot to ask you this. The things  
6 that you do for Frontier, were those things that Frontier  
7 could have chosen to do for itself with its own employees?

8 MR. MAYE: Object to form.

9 THE WITNESS: Do I still answer?

10 BY MR. MCKAY:

11 Q. Yeah, you still answer.

12 A. I suppose they can, yes. Some airlines hire  
13 their own employees to do our services.

14 Q. And your services are known in the industry  
15 as ground handling?

16 A. Correct.

17 Q. Okay.

18 So you're saying that airlines do their own  
19 ground handling; is that correct?

20 A. Yes.

21 Q. Do you know if Frontier does any of its own  
22 ground handling?

23 A. No, I don't believe they do. But I couldn't  
24 be 100 percent positive.

25 Q. Okay.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

30

1                   Do you know whether they use other companies  
2 other than Worldwide at their airports for ground handling?

3         A.        Yes. They use several companies.

4         Q.        Do you know what those companies are?

5         A.        I don't know all of them. I would assume  
6 it's the typical ones. I'm sorry. I couldn't tell you.

7         Q.        That's okay.

8         A.        Swissport I want to say. I don't know if  
9 they employ DGS. I didn't really keep up with the rest of  
10 them.

11        Q.        That's fine.

12                  What I was getting to is, do -- strike that.

13                  Does everyone who does ground handling  
14 services for Frontier use Navitaire now?

15        MR. MAYE: Object to the form.

16        THE WITNESS: Yes, sir. I believe so.

17 BY MR. MCKAY:

18        Q.        And was that the case in March of 2019 as  
19 well?

20        A.        I believe so, yes.

21        Q.        So when you log into Navitaire, are you able  
22 to see entries that are made by other Worldwide employees?

23        A.        Any employee that has access to Navitaire.

24        Q.        So that would be a yes?

25        A.        Yes.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

31

1 Q. And are you able to see entries that are put  
2 into Navitaire by Frontier employees?

3 A. Yes, I do.

4 Q. And if another company like Swissport or DGS  
5 is doing ground handling for Frontier and they put entries  
6 into Navitaire, are you able to see those entries as well?

7 A. Yes.

8 Q. Because it's all one system, right?

9 A. Yes.

10 Q. What did you understand about what Frontier  
11 wanted you to put into Navitaire?

12 A. What do you mean? I'm sorry.

13 Q. So I'm trying to understand how you use  
14 Navitaire.

15 First of all, Navitaire is Frontier's  
16 program, right?

17 A. It's not owned by Frontier, but ...

18 Q. I'm sorry. Yes. I think you probably would  
19 be a better lawyer than I am.

20 So yes, that's right. They have a license to  
21 it, right?

22 A. Right.

23 Q. But you were trained on Navitaire by Frontier  
24 people, right?

25 A. Yes.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

32

1 Q. And when you received that training, what did  
2 they indicate that they wanted you to do with Navitaire?

3 A. As far as the comments are concerned?

4 Q. Yes.

5 A. Just state the facts.

6 Q. Did you ever receive any kind of criticism  
7 from Frontier employees that you were putting certain things  
8 into the comments into Navitaire?

9 A. Me personally?

10 Q. Yes.

11 A. From Frontier employees?

12 Q. Right.

13 A. Not that I recall.

14 Q. Did you ever become aware of anybody at  
15 Frontier saying, "Hey, some of your employees are putting  
16 things into Navitaire, comments that they shouldn't be"?

17 A. I've had a few complaints about that issue,  
18 yes.

19 Q. So let's talk about that.

20 What sort of things did they complain about  
21 being put into Navitaire by your employees?

22 A. Mostly, it's -- they are basically stating  
23 using foul language, things like that. They are writing  
24 what passengers say verbatim and they could have softened it  
25 a little bit, things like that.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

33

1 Q. Do you remember any specific occurrences?

2 A. I can't recall any right now, off the top of  
3 my head.

4 Q. Do you remember the subject matter of what a  
5 customer had said that was put in verbatim?

6 A. Honestly, we were cussed out pretty often.  
7 So I couldn't pinpoint one single occurrence.

8 Q. Do you remember why you were cussed out  
9 pretty often?

10 A. For various things. A lot of times it's just  
11 enforcing the policies and fees, things like that.

12 Q. Did you ever get any passengers who  
13 complained that you were discriminating against them?

14 A. We get that complaint pretty often.

15 Q. And do you think there was ever any validity  
16 to it?

17 A. No, sir.

18 Q. Did you ever have conversations with anybody  
19 at Frontier about discrimination complaints?

20 A. A complaint about me?

21 Q. No.

22 Did you ever have -- in your capacity as a  
23 supervisor, did you ever have any discussions with Frontier  
24 management about the subject of passengers making  
25 discrimination complaints?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

34

1           A.       I'm sure I brought it up a few occurrences  
2 here and there to Eric. However, I couldn't recall, you  
3 know, the specifics of them.

4           Q.       Do you remember what Eric said in response?

5           A.       To the discrimination? I don't recall. I'm  
6 sorry.

7           Q.       Did Eric ever give you any kind of  
8 instructions about how to handle discrimination  
9 complaints?

10          A.       Special instructions? No.

11          Q.       Or any instructions?

12          A.       Not that I can recall.

13          Q.       Other than the instances where foul language  
14 had been input verbatim into the Navitaire system, can you  
15 recall any other complaints from Frontier about what was  
16 being put into the "Comments" section by Worldwide  
17 employees?

18          A.       Not off the top of my head.

19          Q.       Okay.

20                   And I think you said you were never  
21 criticized for anything that you put into the comments,  
22 right?

23          A.       Not that I recall, no.

24          Q.       Okay.

25                   So as far as you understand, Frontier was

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

35

1 happy with everything you put into the Navitaire system?

2 A. I believe so.

3 Q. All right.

4 I'm going to show you now by sharing my  
5 screen a particular document.

6 Are you able to see this document on your  
7 screen?

8 A. Yes.

9 Q. And at the top left is the Frontier logo,  
10 right?

11 A. Correct.

12 Q. And then the next thing down in the center of  
13 the page says "Passenger PNR Details for E95Z4G," correct?

14 A. Correct.

15 Q. What is a PNR?

16 A. Basically, their reservation.

17 Q. To your knowledge, does it stand for  
18 passenger name record?

19 A. I can't remember what the acronym is for, to  
20 be perfectly honest.

21 Q. Okay.

22 But basically, it's your understanding that  
23 it's the passenger's reservation?

24 A. Yes.

25 Q. And at the end, we have this number E95Z4G.

1 Is that a particular record locator for a customer?

2 A. Correct.

3 Q. And a record locator indicator is what  
4 identifies a passenger and a passenger's reservation?

5 A. Correct.

6 Q. So are you able to tell, by looking at this,  
7 who the passengers were that are part of this record  
8 locator?

9 A. Yes.

10 Q. And that's Peter and A [REDACTED] DelVecchia?

11 A. Yeah.

12 Q. Now, up at the top there's something that  
13 says "Total amount paid \$702.08."

14 Do you know what that is?

15 A. How much they paid for the ticket, I'm  
16 assuming.

17 Q. And then to the left of it, it says "Booking  
18 date 2/28/2019."

19 Would that be the date that the passenger, or  
20 passengers, made the reservation and paid for the  
21 reservation?

22 A. Yes.

23 Q. So down below there where it says  
24 "Passengers" and "Flights," there's the DelVecchias' names  
25 and the next line or the next column over says "Date of

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

37

1 birth."

2 Do you see that?

3 A. Yes.

4 Q. And do you understand that to be each of the  
5 passenger's date of birth?

6 A. Yes.

7 Q. And then the next column over is their gender  
8 and then the next column over says "Segment number."

9 What does the segment number mean?

10 A. If it's the first leg of their trip. It  
11 depends how many legs of their trips.

12 Q. So let's say a simple roundtrip from Raleigh,  
13 Durham to Las Vegas, followed by Las Vegas back to Raleigh,  
14 Durham, that would involve two segments?

15 A. If they had a connection flight, it will show  
16 two.

17 Q. I'm sorry. Let's keep it simple with nonstop  
18 flights.

19 So if it's just one nonstop flight out and  
20 one nonstop flight back, would that be two segments?

21 A. I don't believe so, no. I can't -- I don't  
22 think so, no.

23 Q. I'm sorry. I think I've confused you here.

24 So Segment No. 1, tell me what that is in the  
25 context of this reservation?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

38

1           A.       That's Segment No. 1, so their flight from  
2 Las Vegas to Raleigh.

3           Q.       In the other direction, actually -- the  
4 departure. I'm sorry. I'm sorry.

5                   You are absolutely right, once again. This  
6 is -- the first row is the flight from Las Vegas to Raleigh  
7 on April 3rd of 2019.

8                   Do you see that?

9           A.       Yes.

10          Q.       So I guess I was thinking incorrectly that  
11 the one roundtrip reservation there would be segment No. 1  
12 going out and a segment No. 2 coming back. But that's not  
13 actually the way it is in this system, is it?

14          A.       No, it doesn't appear so.

15          Q.       Okay.

16                   So for each of the flights, they are segment  
17 No. 1 on this particular system?

18          A.       Yes.

19          Q.       Okay. All right.

20                   I didn't mean to get so confusing here on  
21 something so unimportant.

22                   So the departure station is where the flight  
23 would be taking off from; is that fair?

24          A.       Yes.

25          Q.       And the check-in location could be either

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

39

1 that airport or perhaps online, right?

2 A. Correct.

3 Q. And then it gives the date that they checked  
4 in and the time that they checked in, right?

5 A. Yes.

6 Q. And then the time of departure, is that the  
7 flight's actual time of departure?

8 A. I would assume so, yes.

9 Q. And then the next column shows whether they  
10 had boarded the flight or not, correct?

11 A. Correct.

12 Q. And the next column shows the arrival  
13 station. That would be the airport where the flight  
14 landed?

15 A. Right.

16 Q. And then the time of arrival would be the  
17 time of the flight landing?

18 A. Yes.

19 Q. Now, these times, as you see up above, it  
20 says "All time displayed in this PNR portal are in Mountain  
21 time."

22 Was that your understanding of how Frontier  
23 displayed the time in the PNRs?

24 A. I honestly never paid attention to that, no.

25 Q. Okay. Fair enough. All right.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

40

1                   So the next segment down has a title "Booking  
2 Contact," and that's just the information on how to get in  
3 touch with the person that made the booking, right?

4                   A.       Yes.

5                   Q.       And then we have a section that says "Booking  
6 comments," and this is what we were just talking about  
7 before, right, where you could go in and put a comment into  
8 the PNR?

9                   A.       Yes.

10                  Q.       And now I want to draw your attention to the  
11 one at the bottom that has your name -- the row at the  
12 bottom, I should say, of this Exhibit 1.

13                  And first of all, that is your name in the  
14 first column, correct?

15                  A.       Yes.

16                  Q.       And what's the number in the column to the  
17 right? Do you need me to go back up to the top?

18                  It says "Created Agent ID." Does that mean  
19 anything to you? It's okay if you don't remember.

20                  A.       I don't recall that number.

21                  Q.       All right.

22                  And then there's a column that says "Created  
23 Agent Code," and the number is 760576. Does that mean  
24 anything to you?

25                  A.       That was my employee number.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

41

1 Q. Okay.

2 Now, was that an employee number with  
3 Worldwide or with Frontier?

4 A. That was my Worldwide employee number. That  
5 was before AirTran, before they changed the number to a  
6 Frontier number.

7 Q. And at some point, you did change to a  
8 Frontier number?

9 A. Yes.

10 Q. Do you remember why that was?

11 A. I guess they just wanted to make everything  
12 uniform. But that's what I assumed.

13 Q. I'm sorry. Go ahead.

14 A. That's what I assumed it was.

15 Q. How did they tell you about that? Did they  
16 just announce that they were going to be issuing you  
17 Frontier numbers, employee numbers?

18 A. My manager mentioned it to me.

19 Q. And that was Eric?

20 A. And Cassie.

21 Q. Cassie, okay.

22 The next says "Created date." Would that be  
23 the date that you put in the comment?

24 A. Yes.

25 Q. And then it says "Created time." Would that

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

42

1 be the time that you put in the comment?

2 A. Yes.

3 Q. Now, this one said 2:05 a.m. on March 29 of  
4 2019. So this is what I'm trying to figure out.

5 Would that have been 2:05 a.m. Mountain time,  
6 so that it was actually 1:05 a.m. your time in Las Vegas?

7 A. I'm not sure.

8 Q. And then the next column is "Comment." Would  
9 this be something that you wrote?

10 A. Is that something I would write? Yes.

11 Q. So you typed this into the Navitaire  
12 reservation system?

13 A. Correct.

14 Q. And the first sentence is "Metro met inbound  
15 FLT 2067." What does that mean?

16 A. The police had arrived when the inbound  
17 Flight No. 2067 came in.

18 Q. Okay. And that is stated in the past tense.

19 Given the date and the time, was it your  
20 understanding that this is something you wrote after the  
21 flight had already landed at Las Vegas?

22 A. Right.

23 Q. The next sentence says "Per FA, all crew  
24 members witnessed inappropriate touching of minor child."

25 What do you mean by FA?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

43

1           A.       The flight attendant A. They were assigned  
2 letters on the flight, so it was A flight attendant.

3           Q.       Now, prior to writing this, did you speak  
4 with flight attendant A?

5           A.       Yeah. When we met the flight, the A was the  
6 one that opened the door and advised us of the situation.

7           Q.       And as you sit here today, do you remember  
8 this situation?

9           A.       I have a vague memory of it, yes.

10          Q.       Were you the person outside the door when she  
11 opened the door?

12          A.       One of them, yes. I can't remember how many  
13 other employees were with me at the time.

14          Q.       So you were present with some of your  
15 employees?

16          A.       I believe so, yes.

17          Q.       And you knew that there was a situation  
18 already before the flight landed, right?

19          MR. MAYE: Object to form.

20          THE WITNESS: Do I know it?

21 BY MR. MCKAY:

22          Q.       Let me ask it another --

23          A.       I want to say yes.

24          Q.       Okay.

25          A.       I was -- I'm sorry. Go ahead.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

44

1 Q. Was there any particular reason that you and  
2 your employees met this particular flight?

3 A. I can't remember or recall how I was made  
4 aware of the situation. A lot of times when I do have to  
5 meet a certain inbound flight, the captain would request it  
6 via ACARS.

7 Q. ACARS, right?

8 A. Correct.

9 Q. And tell us what ACARS is.

10 A. It's basically a messaging from the plane to  
11 ground service.

12 Q. When a plane uses ACARS to message ground  
13 service, where does the message appear at your station?

14 A. Where does it appear?

15 Q. Yeah. Does it appear on the computer  
16 screen?

17 A. Yes.

18 Q. Okay.

19 And is there a particular software that it  
20 appears on?

21 A. Yes.

22 Q. What software is that?

23 A. I can't recall the name of the internet.  
24 It's the one I couldn't remember. I'm sorry.

25 Q. Oh, okay.

**ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES**

March 15, 2022

45

1 So you think that something came in through  
2 ACARS about Flight No. 2067 on March 28 or 29?

A. That would be my best guess.

4 Q. It's not normal for you, the supervisor, to  
5 meet a flight, is it?

A. If it requires a higher --

7 (Remote disconnection.)

8 | BY MR. MCKAY:

9 Q. Do you remember what your answer was,

10 | Ms. Paulo?

11                   A.        I said it requires a higher up. I don't  
12 remember verbatim what I said.

13 Q. Yeah. I think that was it -- if it requires  
14 a higher up.

15 And then I asked if she met every Frontier  
16 flight.

17 And would you just repeat your answer?

18 A. No.

19 Q. And then we got into flight attendant A.

20 So flight attendant A made a statement about  
21 all crew members witnessing inappropriate touching of minor  
22 child. And you heard that statement made by flight  
23 attendant A; is that right?

24 A. Correct.

Q. And that was made just outside the door --

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

46

1 A. Correct.

2 Q. -- of the airplane?

3 A. Correct.

4 Q. And did you, at that time, speak with any  
5 other crew members?

6 A. I can't -- I want to say yes. But to be  
7 completely honest, I don't remember it 100 percent.

8 Typically, the A flight attendant and the B  
9 flight attendant are up in the galley and they aren't  
10 usually the ones that's speaking to me.

11 Q. Okay.

12 And I see you mentioned FB in the next  
13 sentence. Was that flight attendant B?

14 A. Yes.

15 Q. So "FB witnessed touching of thighs."

16 And who said that to you?

17 A. I can't remember if it was A or B.

18 Q. Okay.

19 Do you remember what either flight attendant  
20 A or flight attendant B looked like?

21 A. No.

22 Q. Do you remember whether they were male,  
23 female or male and female?

24 A. I want to say they were both females. A was  
25 definitely female. I can't recall the B.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

47

1 Q. Okay.

2 Is it your understanding that flight  
3 attendant A and flight attendant B are normally the two who  
4 were assigned to the front aircraft, and therefore, are at  
5 the door when the doors open?

6 A. Most of the time, yes.

7 Q. If Frontier instead has flight attendant A  
8 and flight attendant C in the front, if that is true, do you  
9 think you spoke to flight attendant A and flight attendant  
10 C?

11 MR. MAYE: Object to form.

12 THE WITNESS: I can't be sure.

13 BY MR. MCKAY:

14 Q. You're not sure, okay. But the two female  
15 flight attendants who were at the door when it opened told  
16 you the information that you put into this comment, right?

17 A. Correct.

18 Q. And then you say in the third sentence -- or  
19 the fourth sentence, "Father was escorted away by Metro  
20 separate from child to police station."

21 Is that something that you witnessed  
22 personally?

23 A. The police station -- I mean, I didn't follow  
24 them to the police station. But the father was escorted  
25 away by Metro.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

48

1 Q. And that's something you witnessed?

2 A. Correct.

3 Q. And then the next sentence says "Per child,  
4 this was not the first incident that they have been  
5 separated in this manner."

6 Is that something the child said to you?

7 A. I don't think the child spoke to me directly.  
8 I don't recall the child speaking to me directly. I want to  
9 say it was an agent that told me that, or it could have been  
10 a flight attendant. I can't recall.

11 Q. Okay.

12 But it certainly was not the child, correct?

13 A. I want to say I'm 99 percent sure it wasn't  
14 the child itself -- himself.

15 Q. Okay.

16 And then your last sentence says "Checked  
17 luggage pulled and held in BSO."

18 What does that mean?

19 A. Baggage service office. So if they are not  
20 able to claim their baggage right away, we will hold it. We  
21 will make sure we pull it off and hold it for them.

22 Q. Okay.

23 In this case, you knew they were going to the  
24 police station so they wouldn't be able to go down and  
25 retrieve their bags from the carousel, right?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

49

1 A. I believe so, yeah.

2 Q. Okay.

3 So let's go back up to the top of this  
4 comment that you wrote, and the first sentence, "Metro met  
5 inbound Flight No. 2067," that's something that you  
6 personally witnessed, right?

7 A. Yes. Metro was there when they arrived.

8 Q. So you knew when you wrote that sentence that  
9 it was true?

10 A. Okay.

11 Q. Okay.

12 Well, "yes" or "no"?

13 A. Yes.

14 Q. I mean, you saw it with your own eyes,  
15 right?

16 A. Yes.

17 Q. Now, the next sentence, "All crew members  
18 witnessed inappropriate touching of minor child," that's not  
19 something you witnessed with your own eyes, is it?

20 A. Correct.

21 Q. So whether or not that was true depended on  
22 whether or not flight attendant A was telling you the truth,  
23 right?

24 A. Correct.

25 Q. Did you know flight attendant A?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

50

1 A. Not personally.

2 Q. Did you know her at all?

3 A. Just another flight attendant. I don't know  
4 them personally, no.

5 Q. So you didn't know whether she was a truthful  
6 person or not, did you?

7 A. That's correct. I would assume.

8 Q. Now, when you put this into the comments  
9 section, you're stating it as though it's true, right?

10 A. That's why I put "per FA" because that's what  
11 she had told me.

12 Q. So you're saying that per the flight  
13 attendant A, the following is true: All crew members  
14 witnessed inappropriate touching of the minor child, fair?

15 A. Fair.

16 Q. And the other female flight attendant who was  
17 there when the door was opened told you that she witnessed  
18 touching of the thighs?

19 A. I don't recall if it was the A flight  
20 attendant that told me that the B flight attendant had told  
21 her --

22 Q. Okay.

23 A. -- or if the B flight attendant told me.

24 Q. All right.

25 But one way or the other, touching of the

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

51

1       thighs was not something that you saw through your own eyes,  
2 right?

3           A.       Right.

4           Q.       And so when you put this into the booking  
5 comments or into the Navitaire comments, you were stating  
6 the fact that you didn't know whether it was true or not,  
7 right?

8           A.       I just wrote what was told to me.

9           Q.       Okay.

10              And again, you didn't have any way of  
11 verifying that, did you?

12           A.       No.

13           Q.       Okay.

14              Now, "Father was escorted away by Metro  
15 separate from child" was something that you witnessed with  
16 your own eyes, right?

17           A.       They were separated for some time, yes.

18           Q.       Okay. I'll get back to that.

19              And you were told that they were going to the  
20 police station, right?

21           A.       I want to say yes. I'm not 100 percent  
22 sure.

23           Q.       Okay.

24              But at least as far as the father being  
25 escorted away by the Metro police in a manner separate from

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

52

1 the child, that's something you could vouch for because you  
2 were there and you saw it, right?

3 A. Correct.

4 Q. Okay.

5 And then we have the statement "Per child,  
6 this was not the first incident that they have been  
7 separated in this manner." That's something that was not  
8 told to you by the child, right?

9 A. I don't recall who had mentioned it.

10 Q. But you're 99 percent sure it wasn't the  
11 child?

12 A. I'm pretty sure it wasn't the child.

13 Q. So when you say "per child," et cetera, this  
14 wasn't actually told to you by the child?

15 A. I couldn't recall. I can't recall. I'm  
16 sorry.

17 Q. Well, you were 99 percent sure a second ago  
18 that you did not speak to the child.

19 A. Uh-huh.

20 Q. You have to say "yes."

21 A. I'm sorry.

22 Did I speak to the child? No, I don't think  
23 I did. I've heard him speak, but I wasn't engaging in  
24 conversation.

25 Q. Okay.

**ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES**

March 15, 2022

53

When you say "per child, this was not the first incident that they have been separated in this manner," are you actually saying that this is something that someone told to you?

5 A. I can't recall if I overheard him saying it  
6 to someone else or if someone else told me that information.  
7 I don't recall it.

8 Q. So it's fair to say you don't have a memory  
9 of how you got that information, right?

10 A. That's fair to say.

11 Q. And it's also fair to say that you don't know  
12 whether it was true or not, right?

A. That's just what I heard.

14 Q. So it's fair to say you don't know whether it  
15 was true or not?

16 A. That's fair.

17 Q. When you say "checked luggage pulled and held  
18 in BSO," that's something you knew yourself, right?

19                   A.         I didn't personally pull the luggage. I  
20 would assume I had called our agents in BSO to have those  
21 bags pulled.

22 Q. Okay.

23 So it was something that you were at least  
24 involved in ordering?

25 A. Yes.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

54

1 Q. So of all of the information that you put in  
2 here, some of it you knew was true and some of it you didn't  
3 know if it was true or not, right?

4 A. Some of it was hearsay.

5 Q. And the hearsay was all the stuff that had to  
6 do with what happened on the plane, right?

7 A. Correct.

8 Q. And hearsay is something that is not  
9 generally treated as being 100 percent accurate, right?

10 MR. MAYE: Objection to form.

11 BY MR. MCKAY:

12 Q. In your experience?

13 A. In my experience, yes.

14 Q. I mean, people say things that they heard,  
15 and then in your experience, you find out that they were  
16 wrong, right?

17 A. Once in awhile.

18 Q. Okay.

19 So when you hear something that's being  
20 related to you as hearsay, it's something you have some  
21 doubts about normally, right?

22 MR. MAYE: Object to form.

23 THE WITNESS: I suppose it would depend on who and  
24 what it was about.

25 ////

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

55

1 BY MR. MCKAY:

2 Q. If it was something that was relayed to you  
3 by somebody you didn't know, it would be normal to have some  
4 doubts, wouldn't it?

5 MR. MAYE: Object to form.

6 THE WITNESS: If it was a professional employee, I  
7 would assume that it was correct.

8 BY MR. MCKAY:

9 Q. Do you believe that all Frontier employees  
10 speak the truth at all times?

11 A. At all times, no. We are all human.

12 Q. Right.

13 It would be kind of naive to believe that  
14 certain people speak the truth just because of who hires  
15 them, right?

16 A. Correct.

17 Q. So if somebody in a Frontier uniform tells  
18 you something and you don't know that person, you don't have  
19 any way to know whether they are telling you the truth or  
20 not if you haven't actually seen what they are talking  
21 about, right?

22 MR. MAYE: Object to form.

23 THE WITNESS: I guess I wouldn't have any reason to  
24 doubt what they say, depending on what it is they are  
25 talking about.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

56

1 BY MR. MCKAY:

2 Q. Well, if they are talking about an unusual  
3 situation on a plane that you haven't witnessed --

4 A. Uh-huh.

5 Q. -- would you believe there's no room for  
6 doubt?

7 MR. MAYE: Object to the form.

8 THE WITNESS: I guess not 100 percent on it, no.

9 BY MR. MCKAY:

10 Q. Do you know a gentleman named Lawrence  
11 Caravalho?

12 A. Yes, sir.

13 Q. And who is he?

14 A. He was my supervisor.

15 Q. I guess earlier we were talking about a  
16 different supervisor. So when did Mr. Caravalho become your  
17 supervisor?

18 A. I don't recall the month or date -- month or  
19 year.

20 Q. Let's make it easy. Was he your supervisor  
21 at the time you wrote this comment on March 29 of 2019?

22 A. Yes, he was.

23 Q. And he was also an employee of Worldwide?

24 A. Correct.

25 Q. And if we go up, there is an entry from

1 Lawrence Caravalho which is dated 3/28/2019 at 8:06 p.m. and  
2 it says "Called LEO police per SOC, SCSM, separated A [REDACTED]  
3 from Peter found inappropriate touching from Peter to A [REDACTED].  
4 LEO has been called to meet the flight."

5 Do you know what he's saying there?

6 A. Yes.

7 Q. All right. Let's take it a clause at a time  
8 here.

9 "Called LEO Police per SOC." What does that  
10 mean to you?

11 A. SOC, I don't know what the acronym stands  
12 for. It's basically our center of operations that ensures,  
13 you know -- that all of our Frontier flights are running  
14 smoothly.

15 Q. Let me stop you for a second.

16 Is SOC run by Frontier or by Worldwide?

17 A. Correct. Frontier.

18 Q. "LEO Police," what does that mean to you?

19 A. Metro.

20 Q. LEO is an acronym for law enforcement  
21 officer, in your understanding; is that right?

22 A. Yes.

23 Q. And then SCSM, what does that mean to you?

24 A. I can't remember the acronym. But it's the  
25 customer service center of SOC.

1 Q. So also a Frontier center?

2 A. Yes.

3 Q. And then the information that he wrote in the  
4 rest of the sentence -- "separated A [REDACTED] from Peter found  
5 inappropriate touching from Peter to A [REDACTED]," do you know  
6 where Mr. Caravalho got that information?

7 A. He was there when the flight landed.

8 Q. Okay.

9 But look at the time, though, 8:06 p.m. Do  
10 you know what time the flight landed?

11 A. I don't recall. I'm sorry.

12 Q. Well, I was going to ask you if it's  
13 something that you can find on the PNR?

14 A. I'm sorry. Can you scroll up?

15 Q. Yeah.

16 A. Okay.

17 Q. So the departure date is March 28th of 2019  
18 and time of arrival is 11:27 p.m.; am I correct in saying  
19 that?

20 A. Okay.

21 Q. So if you get down to his note, it's that  
22 same date of March 28th, 2019. His note is right here at  
23 8:07 p.m. That's more than three hours before the flight  
24 landed, isn't it?

25 A. I would assume the system recognizes that we

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

59

1 were in separate time zones. I'm not -- I'm not sure.

2 Q. It says at the top in red with an asterisk  
3 "All time displayed in this PNR portal are in Mountain  
4 time."

5 A. Okay.

6 Q. It does say that, right?

7 Okay. So if it says "all time," would you  
8 understand that to mean all time displayed in this document?

9 A. I would assume so. It's March.

10 Q. March 28th, 2019 at 8:06 p.m.?

11 A. Right. But the departure was March 27th,  
12 correct?

13 Q. No.

14 A. Raleigh to --

15 Q. The departure date is 3/28/2019. The  
16 check-in date was 3/27.

17 A. Uh-huh. Check-in date March -- okay. And  
18 the departure -- I'm sorry.

19 Q. The departure date from RDU is 3/28/2019.

20 A. Correct.

21 Q. Time of departure 5:59 p.m., time of arrival  
22 11:27 p.m.

23 So that's after Mr. Caravalho's comment was  
24 created, isn't it?

25 A. Yes.

1 Q. And if you look at the last sentence, it says  
2 LEO," which you've already said is law enforcement officers,  
3 "has been called to meet the flight." That's not saying  
4 that the flight has landed and that the LEO has met the  
5 flight. It's just that they have been called to meet the  
6 flight, right?

7 A. Yes.

8 Q. Okay.

9 So isn't it fair to say that at the time  
10 Mr. Caravalho wrote his message, that the flight is still in  
11 the air and has not yet landed in Las Vegas?

12 A. I mean, the comment that he has separated  
13 A █ from Peter sounds like it had already happened.  
14 He did not separate them in flight.

15 Q. Well, do you have any knowledge of what  
16 happened along those lines?

17 A. Do I have knowledge of what happened with the  
18 timeline?

19 Q. Well, what happened on the flight in terms of  
20 separation.

21 A. I don't believe they were separated. They  
22 were just seen by flight attendants and they had suspicions  
23 of the situation.

24 Q. What do you base that belief on?

25 A. Just from what they had told me when the

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

61

1 plane arrived.

2 Q. Did you speak with anybody about this case at  
3 any time?

4 A. What do you mean?

5 Q. I mean, have you discussed the allegations of  
6 this case with anybody at any time prior to right now, other  
7 than in this deposition?

8 A. No.

9 Q. Did you have a conversation with anybody  
10 prior to the deposition about your deposition testimony?

11 A. No.

12 Q. Have you ever spoken with Mr. Maye or anybody  
13 from his office?

14 A. No.

15 Q. Have you ever spoken with me prior to today's  
16 deposition?

17 A. No.

18 MR. MCKAY: And let me just for the record identify  
19 the document we have been looking at as A. Paulo Depo  
20 Exhibit 1, and it is 16 pages and it is Bates-stamped  
21 19AZF0229 DelVecchia Frontier 0897 on the first page and  
22 0912 on the last page.

23 (Exhibit 1 was marked for identification,  
24 and is attached hereto.)

25 ////

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

62

1 BY MR. MCKAY:

2 Q. Ms. Paulo, is there anything more about this  
3 flight that you know that I haven't asked you about?

4 A. Not that I can recall.

5 MR. MCKAY: All right. Mr. Maye may have some  
6 questions for you.

7 MR. MAYE: Okay. John, do you want to take that  
8 exhibit down?

9 MR. MCKAY: Yes, I will.

10 MR. MAYE: I'll put it up on --

11 MR. MCKAY: Did you want to back up? I'm sorry.

12 MR. MAYE: No. I can put it up on my end.

13

14 EXAMINATION

15 BY MR. MAYE:

16 Q. Ms. Paulo, can I call you "Angelica"? Is  
17 that all right?

18 A. That's fine.

19 Q. Okay.

20 Angelica, at the time of this incident of  
21 8/2019, you were employed by WFS?

22 A. Yes.

23 MR. MCKAY: Objection to form.

24 BY MR. MAYE:

25 Q. And you've never been employed by Frontier?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

63

1 A. That is correct.

2 Q. And the employees of who you supervised at  
3 the McCarran International Airport, they were employees of  
4 WFS?

5 A. Yes.

6 Q. And your manager was a WFS employee, correct?

7 A. Correct.

8 MR. MCKAY: Objection to form.

9 BY MR. MAYE:

10 Q. And Eric was not your manager, right?

11 A. Correct. He was a station manager.

12 Q. Regarding your entry in the reservation about  
13 Mr. DelVecchia's flights -- and let me just pull it up here.

14 Do you see Exhibit 1 on the screen?

15 A. I do.

16 Q. And on Page 0898, there appears to be an  
17 entry by you, "Metro met inbound Flight No. 2067," that's an  
18 entry that you made into the reservation of Mr. DelVecchia,  
19 and you were obligated to make that entry into the  
20 reservation system as part of your duties as a WFS  
21 supervisor?

22 MR. MCKAY: Objection to form.

23 THE WITNESS: Yes.

24 BY MR. MAYE:

25 Q. And are you obligated to make such entries

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

64

1 when law enforcement is called?

2 MR. MCKAY: Objection to form.

3 THE WITNESS: I'm sorry?

4 BY MR. MAYE:

5 Q. I said, are you required to make a  
6 reservation entry when law enforcement is called?

7 A. Yes.

8 MR. MCKAY: Objection to form.

9 BY MR. MAYE:

10 Q. In this case you made this entry because law  
11 enforcement was called or requested to meet the subject  
12 flight?

13 MR. MCKAY: Objection to form.

14 THE WITNESS: I mean, that is not the only reason  
15 why I made a comment.

16 BY MR. MAYE:

17 Q. What were the other reasons?

18 A. Besides the unusual situation, you know, any  
19 complaints that had happened during the flight, I would have  
20 to record it.

21 Q. So upon learning of a report of  
22 inappropriate touching on the flight, as part of your duties  
23 as the WFS supervisor, you were obligated to make this entry  
24 into Mr. DelVecchia's reservation?

25 MR. MCKAY: Objection to form.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

65

1 THE WITNESS: Yes.

2 BY MR. MAYE:

3 Q. And is it a part of your duties and  
4 responsibilities to speak with and talk to flight attendants  
5 about circumstances that led to law enforcement being  
6 requested?

7 A. Yes.

8 Q. And so part of your duties include speaking  
9 with flight attendants, correct --

10 MR. MCKAY: Objection to form.

11 THE WITNESS: Yes.

12 BY MR. MAYE:

13 Q. -- or making an entry in the reservation  
14 system regarding what you learned about the circumstances on  
15 the flight?

16 A. Yes.

17 MR. MCKAY: Objection to form.

18 BY MR. MAYE:

19 Q. And the process of speaking with the flight  
20 attendants and making an entry into the reservation, is this  
21 all the same process or part of the same steps you take when  
22 addressing, I guess, unusual circumstances on a flight?

23 MR. MCKAY: Objection to form.

24 THE WITNESS: Yes.

25 ////

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

66

1 BY MR. MAYE:

2 Q. It's all the same process?

3 A. Yes.

4 MR. MCKAY: Objection to form.

5 BY MR. MAYE:

6 Q. And these are steps that you would routinely  
7 take when you were required to get involved in a  
8 circumstance on a flight?

9 A. Yes.

10 MR. MCKAY: Objection to form.

11 BY MR. MAYE:

12 Q. Did you retain any copies of any reports  
13 related to this incident?

14 A. No.

15 Q. And wouldn't you agree that when you were  
16 speaking to the flight attendants about this incident, that  
17 the information they were providing to you was -- or they  
18 were providing you, the information was a part of their  
19 duties as a flight attendant?

20 MR. MCKAY: Objection to form.

21 BY MR. MAYE:

22 Q. Do you agree?

23 A. I agree.

24 Q. And is there any reason to doubt the veracity  
25 or the truthfulness of what the flight attendants were

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

67

1 relaying to you at that time?

2 MR. MCKAY: Object to the form and asked and  
3 answered.

4 THE WITNESS: Not at that time.

5 BY MR. MAYE:

6 Q. And a part of your duties in inquiring about  
7 the circumstances on the subject flight involves your having  
8 to speak with the flight crew, correct?

9 A. Correct.

10 MR. MCKAY: Object to the form.

11 BY MR. MAYE:

12 Q. That's a part of your process, right?

13 A. Correct.

14 MR. MCKAY: Object to the form.

15 BY MR. MAYE:

16 Q. And a part of your process is to also record  
17 in the reservation what you had learned?

18 MR. MCKAY: Objection to form.

19 THE WITNESS: Correct.

20 BY MR. MAYE:

21 Q. And that's what you did in this case?

22 A. Correct.

23 Q. You mentioned that the system that you  
24 utilized was the Navitaire system, right?

25 A. Correct.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

68

1 Q. What information do you need to access a  
2 particular passenger's reservation?

3 A. I would need as little as the last name  
4 and --

5 Q. So --

6 MR. MCKAY: Well, can you let her answer.

7 THE WITNESS: I'm sorry. Yeah. That's it.

8 MR. MAYE: I think she answered.

9 BY MR. MAYE:

10 Q. So you would need a passenger's last name?

11 A. Correct.

12 Q. And in this case, you would have typed in  
13 Mr. DelVecchia's last name to access his reservation?

14 A. I could access it through other means. Seat  
15 numbers would be one way as well.

16 Q. Okay.

17 Q. How would you know what flight --  
18 withdrawn.

19 Q. If you were looking up the reservation of the  
20 passenger, you would have to know the flight number,  
21 correct?

22 A. Not necessarily.

23 Q. I'm sorry. If you were using the seat number  
24 to find the passenger --

25 A. Oh, yes. If I was using a seat number,

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

69

1 correct.

2 Q. So you could either find the passenger  
3 through the last name, or you could put in the flight number  
4 and the seat number?

5 A. Correct.

6 Q. Okay.

7 And what if you didn't have the passenger's  
8 name or the passenger's flight number; would you be able to  
9 access the passenger's reservation?

10 A. If I didn't know their name, their seat  
11 number, no. It would be very difficult to.

12 Q. And after you made this entry into  
13 Mr. DelVecchia's reservation, did you go back at any time to  
14 review his reservation?

15 A. After I made the comment, I don't believe I  
16 looked at it afterwards.

17 Q. Okay.

18 And there would be no reason for you to look  
19 at it, correct?

20 MR. MCKAY: Objection to form.

21 THE WITNESS: No.

22 BY MR. MAYE:

23 Q. And there would be no reason for, say,  
24 another WFS employee a week after the incident to access  
25 Mr. DelVecchia's PNR, right?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

70

1 A. Object.

2 MR. MCKAY: Objection to form and it calls for  
3 speculation.

4 THE WITNESS: I guess if there was another incident  
5 that made them look at the reservation. I can't tell you.

6 BY MR. MAYE:

7 Q. If there was another incident involving  
8 Mr. DelVecchia?

9 A. Correct.

10 Q. When you worked as a gate agent, what were  
11 the reasons you would access someone's reservation, the  
12 various reasons?

13 A. Besides being aware of unusual situations,  
14 perhaps we are researching whether or not they paid certain  
15 fees or I guess things of that nature.

16 Q. So if a passenger were at the gate and you  
17 were boarding the passenger, you could access the  
18 reservation to determine whether or not they paid for a  
19 bag?

20 A. Correct.

21 Q. Is there any reason to access a passenger's  
22 reservation if you're not specifically dealing with that  
23 passenger on a related issue?

24 MR. MCKAY: Objection to form.

25 Are you proposing her as an expert witness

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

71

1 here, Mr. Maye?

2 BY MR. MAYE:

3 Q. You can go ahead and answer.

4 A. I'm sorry. Could you repeat the question?

5 Q. So you just testified that one of the reasons  
6 you access a reservation is if you're the gate agent and you  
7 want to know if the passenger had paid for a bag, right?

8 A. That would be an example.

9 Q. That's an example.

10 If you were not specifically dealing with a  
11 passenger regarding a baggage issue or a ticketing issue,  
12 would there be any reason for you to access the passenger's  
13 reservation?

14 MR. MCKAY: Objection to form, calls for  
15 speculation.

16 THE WITNESS: Nothing that I can think of.

17 BY MR. MAYE:

18 Q. Do you recall how many police officers  
19 arrived at the gate for this flight?

20 A. I don't recall the specific number, no.

21 Q. Do you recall if there was just one or more  
22 than one?

23 A. They normally walk in with at least their  
24 partner. In this situation, it could have been more.

25 Q. Do you observe the police officers

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

72

1 interviewing Mr. DelVecchia or his son?

2 A. I was not immediately present in that  
3 conversation, no.

4 Q. Were you in the vicinity at the gate when the  
5 police officers were speaking with Mr. DelVecchia and his  
6 son?

7 MR. MCKAY: Objection to the form, asked and  
8 answered.

9 THE WITNESS: I don't believe I was in the vicinity  
10 in order for me to hear what they were saying. But I was in  
11 the gate.

12 BY MR. MAYE:

13 Q. So you were in the vicinity to observe them  
14 being interviewed, but you couldn't hear what they were  
15 saying?

16 A. Correct.

17 Q. How about, did you observe the police  
18 officers interviewing the flight attendants and the  
19 pilots?

20 A. It's customary for the flight attendants to  
21 be speaking to the law enforcement regarding the situation.

22 As far as the pilots are concerned, I don't  
23 recall if they spoke to the captain. I would assume they  
24 said a few words, but the captain was not a witness. So ...

25 Q. Do you recall whether law enforcement

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

73

1       escorted Mr. DelVecchia and his child out of the area after  
2       they completed interviews of the flight crew?

3           A.       I don't recall. I'm going to -- I don't know  
4       if they were fully complete with the interview process with  
5       the flight crew. I know they spoke to them before, you  
6       know, pulling out the passenger.

7           Q.       Okay.

8                   So it's your recollection that law  
9       enforcement interviewed flight attendants before they  
10      removed -- or before the passengers deplaned?

11          A.       Correct.

12          Q.       From your experience, have you seen other  
13      flights that requested that law enforcement meet the  
14      aircraft?

15          A.       Many flights, yes.

16          Q.       And in those circumstances, do the police  
17      officers -- after interviewing the relevant individuals,  
18      have you seen police officers then allow the passengers to  
19      go?

20                   MR. MCKAY: Objection to the form.

21                   THE WITNESS: Yes.

22          BY MR. MAYE:

23          Q.       And have you seen instances where passengers  
24      are brought to the police station?

25          A.       I don't physically see them being brought to

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

74

1 the police station. But several times it has been mentioned  
2 to me by the officer that they will be taken down there.

3 Q. And from your observations, is it the police  
4 officer who makes the decision whether or not the passenger  
5 is released or brought to the police station?

6 A. It is their decision, yes.

7 Q. Did the police officers speak to you about  
8 what you had learned?

9 A. I don't recall.

10 Q. You mentioned that Jessica Esteban was your  
11 supervisor, right?

12 MR. MCKAY: Objection to form.

13 THE WITNESS: When I first started, yes.

14 BY MR. MAYE:

15 Q. Was she a WFS employee?

16 A. Yes.

17 Q. You mentioned that in approximately 2013, you  
18 started working -- you became assigned to the Frontier  
19 counter, correct?

20 A. Correct.

21 Q. At that time there was no station manager?

22 A. Correct.

23 Q. Do you recall when Eric started as the  
24 station manager?

25 A. I don't recall, no.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

75

1 Q. Was it closer to 2019 or closer to 2013?

2 A. Probably closer to 2013.

3 Q. Do you recall if -- whether there was no  
4 station manager for a year or two or four years? Any  
5 recollection?

6 A. I want to say maybe just a year or two.

7 Q. Okay.

8 As the station manager, Eric didn't supervise  
9 WFS employees, correct?

10 MR. MCKAY: Object to the form.

11 THE WITNESS: Correct.

12 BY MR. MAYE:

13 Q. You were responsible for supervising WFS  
14 employees, right?

15 MR. MCKAY: Objection to the form.

16 THE WITNESS: Correct.

17 BY MR. MAYE:

18 Q. And you had the responsibility to hire and  
19 fire WFS employees, right?

20 A. Correct.

21 Q. Eric didn't have the authority to hire and  
22 fire WFS employees, right?

23 MR. MCKAY: Objection to the form.

24 THE WITNESS: Did he have authority? He could  
25 request them off the contract, but he really can't fire

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

76

1 them.

2 BY MR. MAYE:

3 Q. You said on a handful of occasions he would  
4 suggest to you, "Hey, maybe this person isn't the right  
5 fit," right?

6 A. Right.

7 Q. But he didn't have the authority to go after  
8 and just fire WFS employees, right?

9 A. No.

10 Q. And Eric didn't control WFS employees,  
11 right?

12 MR. MCKAY: Objection to the form.

13 THE WITNESS: What do you mean "control"?

14 BY MR. MAYE:

15 Q. Control their movements or their assignments;  
16 he wasn't responsible for their discipline or performance  
17 evaluations?

18 MR. MCKAY: Objection to the form.

19 THE WITNESS: Not to that extent.

20 BY MR. MAYE:

21 Q. Would you agree that WFS employees were  
22 trained not to discriminate against passengers?

23 MR. MCKAY: Objection to the form.

24 THE WITNESS: That is correct.

25 ////

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

77

1 BY MR. MAYE:

2 Q. And would you agree that WFS employees knew  
3 that committing racial discrimination was wrong?

4 A. That is correct.

5 Q. And that it was prohibited?

6 A. Correct.

7 MR. MCKAY: Objection to the form.

8 BY MR. MAYE:

9 Q. You personally -- as a WFS employee, were you  
10 ever given the impression that committing racial  
11 discrimination was something that Frontier tolerated?

12 MR. MCKAY: Objection to the form.

13 THE WITNESS: Tolerated? It's not tolerated.

14 BY MR. MAYE:

15 Q. And as a WFS employee, you had an expectation  
16 that if a WFS employee had committed racial discrimination,  
17 that employee would be disciplined, right?

18 MR. MCKAY: Objection to the form.

19 THE WITNESS: Correct.

20 BY MR. MAYE:

21 Q. When you worked for AirTran, did passengers  
22 make discrimination complaints against AirTran?

23 MR. MCKAY: Objection to the form.

24 THE WITNESS: That was long ago. Not that I  
25 recall.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

78

1 BY MR. MAYE:

2 Q. You mentioned that while you worked as a WFS  
3 employee, you were aware of passengers making complaints of  
4 discrimination, right?

5 A. They would blurt it out every once in awhile  
6 when they were upset.

7 Q. What was the context? What were the  
8 circumstances regarding these passengers making such  
9 accusations?

10 A. Mostly when they are just either upset that  
11 we are enforcing the policy regarding fees or any kind of  
12 policies that they don't agree with.

13 They, most of the time, would throw out  
14 basically a race card.

15 Q. You earlier said -- I'm sorry. I'm sorry.

16 A. I'm sorry.

17 Q. I cut you off there. I apologize.

18 And you had testified earlier that none of  
19 these claims had merit?

20 MR. MCKAY: Objection to the form.

21 THE WITNESS: Correct. Yes.

22 BY MR. MAYE:

23 Q. And were you ever accused of racial  
24 discrimination by a passenger being racist?

25 A. I think just about every gate agent has been,

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

79

1 yes.

2 Q. And what was the race of the passenger, or  
3 passengers, who accused you of committing racial  
4 discrimination?

5 A. They were every race.

6 Q. Caucasian?

7 A. Caucasian.

8 Q. Asian?

9 A. Asian.

10 Q. African-American?

11 A. African-American, Middle Eastern. Just about  
12 every race out there. Everyone out there tries to claim  
13 that we are racist, yes.

14 Q. And are you a racist?

15 A. No.

16 MR. MCKAY: Objection to form.

17 BY MR. MAYE:

18 Q. You're someone who wouldn't tolerate other  
19 WFS employees committing racial discrimination?

20 A. That's correct.

21 Q. And when these passengers accused you of  
22 racial discrimination, would you agree that there was no  
23 basis for that?

24 A. That is correct.

25 Q. Just to clarify something, earlier you were

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

80

1 asked some questions about the statement that you noted in  
2 the report -- "Per child this was not the first incident  
3 that they have been separated in this manner."

4 A. Uh-huh, yes.

5 Q. Is it accurate that you testified that it's  
6 possible that you overheard the child say that to another  
7 agent?

8 A. That's possible, yes.

9 MR. MCKAY: Objection to the form.

10 BY MR. MAYE:

11 Q. Regarding the Frontier flight crew involved  
12 in this incident, would you characterize them as  
13 professional?

14 A. Yes.

15 MR. MCKAY: Objection to the form.

16 BY MR. MAYE:

17 Q. Did you ever speak with Lawrence about his  
18 involvement in this case?

19 A. About his involvement?

20 Q. Yeah. His being assigned to this flight and  
21 being involved in -- or what his involvement was.

22 A. Can you clarify?

23 Q. Yeah. I'm sorry.

24 Did you ever speak to Lawrence about his  
25 making an entry into the Navitaire system regarding calling

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

81

1 law enforcement?

2 A. Any agents that is involved with a situation,  
3 they were asked to always input, comment in the reservation  
4 as to what had happened.

5 Q. I guess I'm trying to understand, if you and  
6 Lawrence were there at the same time --

7 A. I'm sorry. Just a second, if you don't  
8 mind.

9 THE VIDEOGRAPHER: Do you want to go off the record,  
10 Counsel?

11 MR. MCKAY: Sure. Let's go off.

12 THE VIDEOGRAPHER: Going off the record. The time  
13 is 11:56 a.m. Pacific time.

14 (Brief pause in the proceedings.)

15 THE VIDEOGRAPHER: Going back on the record. The  
16 time is 12:00 p.m.

17 BY MR. MAYE:

18 Q. Angelica, do you remember who the gate agent  
19 was that was assigned to this flight?

20 A. I don't recall, no.

21 Q. Do you know who actually called and requested  
22 that law enforcement meet the aircraft?

23 A. I don't remember those details, no.

24 Q. Do gate agents, is that part of their duties  
25 to call or contact law enforcement and request their

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022  
82

1 presence at an arriving flight?

2 A. In situations such as these, I want to say  
3 they were not the ones that called.

4 Q. Who would have -- in your experience, who  
5 would have called law enforcement and requested their  
6 presence?

7 A. Multiple other people could have called. It  
8 could have been the -- if it was an ACARS message that came  
9 through first, it could have been -- I'm sorry. The  
10 dispatcher could have -- I'm sorry. The office agent could  
11 have called law enforcement.

12 Any other supervisor who might have been  
13 contacted by SOC first might have called law enforcement. I  
14 don't recall who did.

15 Q. You said office agent. Is that a WFS  
16 employee at the airport?

17 A. Correct.

18 MR. MAYE: That's all I've got. No more questions  
19 for me.

20 MR. MCKAY: Ms. Paulo, I've got a few more, and then  
21 we will let you go.

22

23 FURTHER EXAMINATION

24 BY MR. MCKAY:

25 Q. You had testified about AirTran before.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

83

1 AirTran is the airline that used to be ValuJet; is that  
2 right?

3 A. I don't recall their history --

4 Q. Okay.

5 A. -- but I want to say yes.

6 Q. Before AirTran was acquired by Southwest, it  
7 operated similar to Frontier as a low-cost airline, right?

8 A. I'm sorry?

9 Q. I said, before AirTran was acquired by  
10 Southwest Airlines, it operated similar to Frontier, in that  
11 it was a low-cost budget airline, right?

12 A. It was considered a low cost carrier at that  
13 time. However, extremes of low costs have gotten up there  
14 recently.

15 Q. Would you consider Frontier to be an extreme  
16 of low cost?

17 A. Yes, yes.

18 Q. And Spirit as well?

19 A. Yes.

20 Q. So in the four years that you did ground  
21 handling for AirTran, you don't recall hearing a complaint  
22 of discrimination, right?

23 A. You know what? Now that I've had some time  
24 to think about it, yes. I do recall sometimes where I was  
25 accused of being a racist.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

84

1 Q. How many? Like a couple?

2 A. A lot less than Frontier, yes.

3 Q. But with Frontier, I think you said every  
4 gate agent has been accused by a passenger of being racist  
5 or of discrimination?

6 A. I'm sure. It's come up pretty often.

7 Q. And it's involved every race you testified,  
8 right?

9 A. It's involved just about everybody that's  
10 upset with any kind of policies that they don't agree  
11 with.

12 Q. Well, what's the difference between your  
13 experience with AirTran where there were only a couple of  
14 complaints and with Frontier with a lot of complaints?

15 What do you see as being the difference?

16 A. A lot of fee policies. There's a lot more  
17 fees with Frontier than there was with AirTran.

18 Q. So the pinch point, so to speak, is when  
19 people are told that they need to pay fees that they don't  
20 want to pay?

21 A. Correct.

22 Q. And sometimes people say that they have paid  
23 a fee, right, that they are told that they haven't paid?

24 A. There would be times where we had to  
25 research.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

85

1 Q. Have you seen people removed from Frontier  
2 flights at Las Vegas airport?

3 A. From Frontier? Oh, yes. Plenty of times.

4 Q. Plenty of times.

5 And what were those for?

6 A. All kinds of reasons. Besides being  
7 noncompliant, being drunk, being, you know, belligerent, or  
8 any kind of reason.

9 Q. And were those often people of color?

10 A. Often? I mean, there was -- I don't recall  
11 the percent of each race.

12 No. It's just whenever it happens, you know,  
13 they are removed.

14 Q. Would it be fair to say there were fewer  
15 white people removed from planes than people with color?

16 A. That would not be a fair statement.

17 Q. Do you think it's 50/50?

18 A. It could be. Like I said, I don't really pay  
19 attention to race when it comes to that matter.

20 Q. So would the fairest answer be, you really  
21 haven't looked at any statistics on that question?

22 A. I have not looked at statistics, no.

23 Q. You said it was -- in response to  
24 Mr. Maye's question about your prior testimony saying that  
25 it was possible that you heard the child say that they had

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

86

1       been separated before, were you ever around the child when  
2       he was not being questioned by the police?

3           A.       Was I around? No, I don't recall being  
4       around the child when he was speaking to police, no.

5           Q.       And you've already testified that you could  
6       not hear what either he or his father were saying when they  
7       were being questioned by the police, right?

8           A.       Correct.

9           Q.       Let me just ask you -- I forgot to ask this  
10      before. Why did you leave Worldwide Flight Services?

11          A.       I was terminated from Eric's request.

12          Q.       And why was that?

13          A.       Not responsive enough on e-mails or, say,  
14      just overall performance, I guess.

15          Q.       So first of all, Eric is the station manager,  
16      right?

17          A.       Correct.

18          Q.       And Eric is a manager and employee of  
19      Frontier?

20          A.       Correct.

21          Q.       And Eric got you fired?

22          A.       He had requested I be removed from the  
23      operation, and Worldwide did not have a position for me at  
24      the time.

25          Q.       So you were fired?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

87

1 A. Correct.

2 Q. And that was based on Eric's request?

3 A. Correct.

4 Q. And what specifically was the issue that Eric  
5 found to be a problem?

6 A. There's not one incident, if that's what  
7 you're asking.

8 Q. Okay.

9 Tell me then, if you had to describe from  
10 Eric's standpoint, what he was unhappy with about your  
11 performance, what would Eric say?

12 A. I guess I was not responsive enough on  
13 e-mails. That's one -- the reason why my general manager  
14 had mentioned was just not being responsive enough.

15 It was very hard to be responsive when you  
16 have an operation that's run short staffed. So the e-mail  
17 response was not immediate.

18 Q. Okay.

19 And whose decision was it regarding how many  
20 people were on the staff?

21 A. Whose decision was it?

22 Q. Yes. If short staffing was a problem, where  
23 did the buck stop as far as how many people were employed in  
24 the staff?

25 A. We have had meetings about staffing pretty

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

88

1 frequently. It's just -- I mean, we are constantly hiring.  
2 And you lose them as quickly as we hire. So it was a  
3 struggle.

4 Q. Well, was Frontier involved in those  
5 meetings?

6 A. Oh, of course. Yes.

7 Q. So Frontier had a say in how many people were  
8 working?

9 A. Yes.

10 Q. Did they want less people working?

11 A. No. More.

12 Q. They wanted more people working?

13 A. Of course.

14 Q. But you felt that the end result was that you  
15 were understaffed?

16 A. That's the normal situation.

17 Q. So you felt that that was the case?

18 A. At that time? I can't recall if I was short  
19 staffed at that time.

20 There's times when we were adequate.

21 Q. All right.

22 Well, you said that it was difficult to  
23 respond to an e-mail in a timely fashion when you were  
24 understaffed.

25 Did I understand that correctly?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

89

1 A. Yes, you did. Uh-huh.

2 Q. And you said that Eric had a problem with  
3 your not being responsive to e-mails, right?

4 A. Correct.

5 Q. And what were these e-mails about?

6 A. Multiple -- a multitude of stuff. I couldn't  
7 recall every little thing. I'd get about 200 e-mails a  
8 day.

9 Q. But your office is at McCarran Airport,  
10 right?

11 A. Correct.

12 Q. And you were physically at McCarran Airport,  
13 correct?

14 A. Correct.

15 Q. And Eric's office is at McCarran Airport?

16 A. Correct.

17 Q. And Eric is physically at McCarran Airport?

18 A. Correct.

19 Q. Were you both physically at the airport  
20 during the same times?

21 A. Typically.

22 Q. So couldn't Eric just have walked out of his  
23 office and asked you in person this information that he  
24 wanted?

25 A. The e-mails are not necessarily from him. It

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

90

1 could be all kinds of people.

2 Q. So he was overseeing your e-mail responses to  
3 other people in Frontier?

4 A. If he's cc'd in, yes. Most of the time, he  
5 is.

6 Q. Did you and Eric get along?

7 A. Yes, for the most part.

8 Q. Well, how about -- you say "for the most  
9 part." Were there --

10 A. We are cordial.

11 Q. Okay.

12 And did somebody replace you after you were  
13 terminated?

14 A. From what I hear, yes.

15 Q. Okay.

16 Did you know that person?

17 A. Not personally. But she was the manager for  
18 another contract.

19 Q. Okay.

20 And do you know what her name is?

21 A. I don't recall her last name. I want to say  
22 her first name was Lisa. I can't remember her last name.

23 Q. Is Lisa Caucasian?

24 A. Correct.

25 Q. Now, you testified that -- strike that.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

91

1                   Do you have any plans to file any kind of  
2 legal action against Frontier?

3                   A.       No.

4                   Q.       Do you have any plans to file any legal  
5 action against Worldwide Flight Services?

6                   A.       No.

7                   Q.       You testified about awareness of flights  
8 where other things have happened. Have you ever been aware  
9 of any flight where a flight attendant hit a passenger?

10                  A.       Hit a passenger?

11                  Q.       Yes.

12                  A.       Not that I recall.

13                  Q.       And you've been involved with the comings and  
14 goings of, I would say, hundreds of flights?

15                  A.       Thousands, yes.

16                  Q.       Thousands of flights, okay.

17                  So in thousands of flights, you can't recall  
18 ever hearing of a flight attendant hitting a passenger?

19                  A.       No.

20                  Q.       Have you ever, in these thousands of flights,  
21 heard about a situation where a flight attendant took a  
22 parent's child away from them during a flight?

23                  A.       During a flight?

24                  Q.       Yeah.

25                  A.       No. During a flight, not that I recall.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

92

1 Q. Would you consider either of those things to  
2 be an appropriate thing to happen on an airline flight?

3 MR. MAYE: Object to form.

4 THE WITNESS: No.

5 BY MR. MCKAY:

6 Q. You testified previously that you said the  
7 captain was not a witness. Can you explain that?

8 A. I mean, he's not in the cabin with the  
9 passengers when all of this is happening. He's flying the  
10 plane.

11 Q. But on a long cross-country flight, there's  
12 periods when the flight is being operated on auto pilot,  
13 right?

14 A. Correct.

15 Q. So theoretically, a captain could get  
16 involved in a situation, right?

17 A. Theoretically --

18 MR. MAYE: Object to form.

19 THE WITNESS: -- but it's not policy.

20 BY MR. MCKAY:

21 Q. Did you witness the police officers  
22 interviewing any other passengers other than the ones who  
23 were accused in this incident?

24 A. Not that I recall.

25 Q. If it had happened, do you think you would

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

93

1 have seen it?

2 A. Most of the time, I do. However, I can't be  
3 in all places at once. They could have spoken at the gate  
4 area when I was in the jet bridge. I'm not sure.

5 Q. Or baggage claim, for instance?

6 A. Or that.

7 Q. From the moment the door was opened when the  
8 flight landed, was there a period of time where the  
9 passengers were held in the plane?

10 A. Yes.

11 Q. Do you remember how long that was?

12 A. Like -- I don't recall how long, no. It must  
13 have been just a few minutes.

14 Q. Would it have been possible for the police to  
15 have interviewed other passengers during that time onboard  
16 the plane?

17 A. While onboard a plane?

18 Q. Yeah.

19 A. I can't imagine that they would. I mean,  
20 theoretically, it could happen. But like I said, I wouldn't  
21 assume that would be their policy to do so.

22 Q. I guess what I'm asking is, like, length of  
23 time. Was there enough time for a police officer to have  
24 gone onboard and interviewed other passengers before they  
25 started?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

94

1           A.       The length of time? I wouldn't think so.

2       But it could have happened.

3           Q.       You testified in response to Mr. Maye's  
4       questions that you knew the last name. You could see the  
5       PNR.

6           A.       Uh-huh.

7           Q.       And if you knew the flight number and the  
8       seat number, you could see a particular PNR?

9           A.       Yes.

10          Q.       And then you said, otherwise, it would be  
11       very difficult?

12          A.       Correct.

13          Q.       But it would be possible?

14          A.       It's possible.

15          Q.       And in what ways would it be possible to do  
16       that?

17          A.       For instance, had I known the situation -- if  
18       I don't have a seat number or last name, if I knew it was a  
19       gentleman traveling with a minor, I would look for parties  
20       of two, male, a certain age.

21                   I would be able to look at their date of  
22       birth and make assumptions from there.

23          Q.       Are people able to search the comments in the  
24       same way that you would do, say, a Google search or a Bing  
25       search?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

95

1 A. No.

2 Q. Can you put in key words and pull up matching  
3 PNRs?

4 A. No.

5 Q. But you can put in dates of birth and  
6 genders?

7 A. No, no, no. If I knew what the flight number  
8 was, I would be able to see all of the passengers on that  
9 flight.

10 Q. I see, okay.

11 Can you just randomly pull up a PNR?

12 A. I guess it's possible, yes.

13 Q. Now, the Flight No. 2067 that landed at  
14 Las Vegas, for the DelVecchia reservation, that was the  
15 first of a round-trip flight, right, the first flight of a  
16 round-trip itinerary is what I should say?

17 A. I believe so, yes.

18 Q. So if the DelVecchias, either one of them,  
19 had called Frontier prior to boarding the second flight,  
20 that would have caused somebody to open up their PNR,  
21 right?

22 A. Yes.

23 Q. And do you know whether that occurred?

24 A. I don't know.

25 Q. And also, if you go into a PNR, you can read

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

96

1       the comments that somebody has put in there before you,  
2       correct?

3           A.       Yes.

4           Q.       For instance, you read Mr. Caravalho's,  
5       right?

6           A.       Yes.

7           Q.       Did you speak with Mr. Caravalho in person  
8       about this flight before it landed?

9           A.       Before it landed?

10          Q.       Uh-huh.

11          A.       If we were in the same room together when we  
12       received that call, I'm assuming so, yes.

13          Q.       Do you recall speaking with Mr. Caravalho  
14       about this flight after it landed?

15          A.       A lot of times we would talk about the  
16       unusual circumstances that happened in that day, yes.

17          Q.       So you spoke with him?

18          A.       I don't recall. I think so. I don't recall  
19       the conversation itself.

20          Q.       Do you recall any other complaints that  
21       concerned this Flight No. 2067 on that date?

22          A.       No.

23          Q.       Any other special circumstances involving  
24       another passenger?

25          A.       Another passenger?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022  
97

1 Q. Yes.

2 A. I don't recall.

3 Q. Does that mean that there could have been or  
4 that you don't think there were?

5 A. There could have been. But that was the most  
6 memorable situation.

7 Q. And why was it memorable?

8 A. Just it never happened before. It was  
9 unusual.

10 Q. And what was it about the flight that had  
11 never happened before?

12 A. Just the fact that, you know, the accusations  
13 of sexual harassment.

14 Q. Okay.

15 That's the only thing?

16 A. A possible -- what did he say? A possible  
17 abduction. I'm not sure if I'm using the right word. But  
18 the flight attendants wasn't sure if they were related.

19 So this could have been -- what's the word?  
20 I'm not sure if child abduction is the right word.

21 Q. Sex trafficking?

22 A. Trafficking maybe, yes. Yes.

23 Q. And what was it about them that she said  
24 raised doubts about whether they were related?

25 A. What was it about --

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

98

1           Q.        Yeah. Why did the flight attendant have  
2 questions about whether they were related?

3           A.        I mean, she did mention that he was Caucasian  
4 and the young boy was not; and, you know, that he was being  
5 touched in inappropriate ways.

6           Q.        Well, that doesn't -- the accusation that  
7 somebody is being touched doesn't really affect whether they  
8 are related or not, does it?

9           A.        I mean, there's different ways that you touch  
10 certain people. And just -- this is not one of them, I  
11 guess.

12          Q.        Well, the subject is, why do you think there  
13 were questions raised about whether or not these two were  
14 related. And you brought up the fact that the father was  
15 Caucasian and the child was not.

16                   The child was black, right?

17          MR. MAYE: Object to form.

18          THE WITNESS: He was.

19 BY MR. MCKAY:

20          Q.        So you have a white dad and a black son,  
21 right?

22          A.        Okay. Yes.

23          Q.        Now, did the flight attendant indicate  
24 whether she had asked to see their boarding passes?

25          A.        I don't recall that question being brought

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

99

1 up.

2 Q. Well, if they both have the same last name,  
3 wouldn't that be an indication that they were related?

4 A. That could be. However, it's hard to prove  
5 the last name of a child, if the child does not require an  
6 ID.

7 Q. But the child requires a boarding pass to get  
8 on the plane.

9 A. That's correct. However, the child can check  
10 in without showing ID. So they could literally board with  
11 any name, so long as an adult vouches that that is their  
12 name.

13 Q. So if there is a white adult traveling with a  
14 black child, there are concerns, in your mind, that the  
15 white adult might be lying about the black child's last  
16 name?

17 MR. MAYE: Object to form. That's not what she  
18 said.

19 You can answer.

20 THE WITNESS: That, you know, can happen.

21 BY MR. MCKAY:

22 Q. Well, a lot of things can happen. But one  
23 thing that can happen is that a white parent has a black  
24 child, isn't it?

25 A. Yeah. Of course.

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

100

1 Q. Okay. So again, back to this.

2 Again, what was it that raised questions  
3 about whether or not they were related?

4 MR. MAYE: Object to form.

5 THE WITNESS: I couldn't tell you. I didn't -- I  
6 wasn't the flight attendant who made the accusation. But  
7 if -- I would assume if they see something out of -- I  
8 wouldn't say out of place, but if they see something  
9 unusual, they see a child and they can't directly tell who  
10 the parents are, they keep an eye on that child. And that's  
11 probably what had happened.

12 And --

13 BY MR. MCKAY:

14 Q. Now, if a white parent is traveling with a  
15 white child, you don't know exactly who the child's parents  
16 are, do you?

17 A. No. Just from their behavior, I suppose.

18 Q. Whose behavior? The parent or the child?

19 A. Typically, both.

20 Q. So if a white parent is traveling with a  
21 white child and there is no suspicious behavior, then you  
22 assume that the white child is the child of the white  
23 parent?

24 A. The assumption is yes.

25 Q. Now, you said that this was the first time

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

101

1       this unusual situation had happened in your experience, but  
2       you've seen many times when the police have been called,  
3       right?

4                  A.       Yes.

5                  Q.       So the police hadn't been called before  
6       because of allegations like this?

7                  A.       I personally, no. But I couldn't tell you if  
8       it's happened before or with other people, other agents,  
9       other airlines.

10                 Q.       But it was an unusual situation to you with  
11      nine years of experience doing ground handling and thousands  
12      of flights under your belt, this was an unusual experience  
13      because of the types of allegations being made and the fact  
14      that the police had been called; is that a fair statement?

15                 A.       That's not the first accusation of a possible  
16      child abduction. But it's up there.

17                 Q.       Well, you said this was a first. So what was  
18      the first incident?

19                 A.       Well, it was the aspect of -- I'm not sure  
20      what I'm trying to think of right now.

21                         To be honest, I'm not sure.

22                 Q.       Well, you were a minute ago when you said it  
23      was a first. So I'm trying to find out why it was a first.

24                 A.       The first what? I'm sorry. Could you repeat  
25      that?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

102

1 Q. You said it was an unusual situation and the  
2 first, in your experience.

3 Now, you have previously had LEOs called to  
4 meet a flight, right?

5 A. Yes.

6 Q. You've previously had allegations of child  
7 abduction, right?

8 A. Uh-huh.

9 Q. You have to say "yes" or "no."

10 A. Oh, I'm sorry. Yes.

11 Q. So I'm still trying to find out why you  
12 identified this as so unusual, that it was a first?

13 A. I might have misspoken. It might not have  
14 been the first. But it does stick to my mind for me to  
15 remember it after all of these years, yeah.

16 Q. Well, it stuck out for a reason. And what  
17 was the reason?

18 A. I'm not sure.

19 Q. Well, I still need to know why you said that.

20 MR. MAYE: Objection. She said she was not sure.

21 MR. MCKAY: I know what she said, Brian. I'm  
22 actually able to hear her.

23 MR. MAYE: I know. But I think --

24 MR. MCKAY: So I think that I want to find out what  
25 it was about this situation that made it unique, in her

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

103

1 experience.

2 THE WITNESS: Okay. So it was, A, the accusation of  
3 a possible abduction, and I guess it's the fact that it  
4 was -- I don't know.

5 BY MR. MCKAY:

6 Q. A white dad and a black child?

7 A. It could be.

8 MR. MAYE: Object to form.

9 WITNESS: It could be.

10 BY MR. MCKAY:

11 Q. Go ahead.

12 A. I remember it because of the two, I mean.

13 But ...

14 Q. You remember it because of what? I'm sorry.  
15 That they were different races?

16 A. I remember the situation. I mean, I couldn't  
17 tell you what stuck out.

18 Q. The dog wants back in.

19 A. No. My husband just came in.

20 Q. So did you ever, at any time, entertain any  
21 doubts about whether the accusations were true or not?

22 A. I mean, there's always going to be some  
23 doubts. I understand that there's adoptions and whatnot.  
24 So ...

25 Q. So did you have some doubts as to whether the

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

104

1 allegations were true or not?

2 A. I wasn't 100 percent on it. But, you know,  
3 I do have to follow protocol and see if (inaudible).

4 Q. You did make a statement in the booking?

5 A. Say that again.

6 Q. You said you had "to follow protocol and ..."

7 What was after that?

8 A. Just follow, you know -- take precautions  
9 first.

10 Q. Okay.

11 And those precautions included the comments  
12 that you put in Exhibit 1?

13 A. That included calling Metro and have them  
14 sort out the situation.

15 Q. Did you talk to Metro after they had  
16 investigated?

17 A. No.

18 Q. Did you talk to the FBI after the FBI  
19 completed its investigation?

20 A. No.

21 Q. Did you know the FBI were involved?

22 A. No.

23 Q. When you talk about the protocols, those are  
24 the protocols that Frontier maintains?

25 A. Which protocols?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

105

1 Q. Well, you said that you had to follow  
2 protocols. Those were the protocols that the Frontier  
3 employees had trained you in?

4 MR. MAYE: Object to form.

5 THE WITNESS: I'm sorry. We talked about several  
6 different protocols. So I'm talking about once we call  
7 Metro, we typically have Metro take care of the situation.

8 They would only really ask me anything if  
9 future travel of Frontier is involved.

10 BY MR. McKAY:

11 Q. Well, future travel with Frontier was  
12 involved in this case, wasn't it?

13 A. Yes.

14 Q. So did they ask you anything about that?

15 A. No.

16 Q. There are some comments in Exhibit 1 from  
17 some other people. Let me just bring it up for a second to  
18 get the names. Okay.

19 We have a Kathia Robles Cabral. Do you know  
20 that person?

21 A. No.

22 Q. Claudette Patero, do you know that person?

23 A. No.

24 Q. Okay.

25 Daniela Cruz Velasquez, do you know that

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

106

1 person?

2 A. No.

3 MR. MCKAY: All right. That's all I have.

4 Brian, do you have any more questions?

5 MR. MAYE: I just have one or two.

6

7 FURTHER EXAMINATION

8 BY MR. MAYE:

9 Q. Angelica, in Exhibit 1, it shows in the entry  
10 that you made into the reservation that you identified the  
11 passengers who were separated as father and child.

12 Were you made aware at some point, speaking  
13 with the flight attendants, that this was a father and son?

14 A. I want to say after it was mentioned that it  
15 was not their first time, I assumed that was his -- the  
16 child's statement that they are related.

17 Q. Do you recall anyone telling you that they  
18 are father and son, or are you saying that you noted that  
19 based on hearing that the child said "This isn't the first  
20 instance it's happened"?

21 A. Well, the flight crew mentioned that they  
22 don't know if that was a father and son. But it was, I  
23 guess, in my head confirmed when he mentioned it.

24 Q. When the child said "this is not the first  
25 time this has happened"?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

107

1 A. Right.

2 Q. And you testified earlier that it's possible  
3 that you overheard the child saying that to another gate  
4 agent?

5 A. I can't recall.

6 MR. MCKAY: Objection. That is not her testimony.

7 MR. MAYE: Yes, it was her testimony.

8 THE WITNESS: I can't recall if it was a gate agent  
9 or the flight attendant that was in (inaudible).

10 BY MR. MAYE:

11 Q. So it's possible that you overheard the  
12 child --

13 (Interruption in the proceedings.)

14 THE WITNESS: I'm so sorry about that.

15 BY MR. MAYE:

16 Q. Oh, that's totally fine.

17 So your testimony is that it's possible that  
18 you heard the child telling someone that this was not the  
19 first time that this has happened?

20 MR. MCKAY: Objection to the form of the question.

21 BY MR. MAYE:

22 Q. I'm sorry. That is correct?

23 A. That is correct.

24 Q. If a gate agent doesn't know the name of a  
25 passenger and doesn't know the flight number, is there any

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

108

1 way for that gate agent to locate the passenger's  
2 reservation?

3 A. Doesn't know the flight number or the name?

4 Q. Correct.

5 A. I don't believe so.

6 MR. MAYE: I have no further questions.

7 Thanks, Angelica. I appreciate it.

8 MR. MCKAY: I'm sorry. But we have to go back to  
9 this because if we keep having different versions of the set  
10 of facts, then we just have to inquire into them now.

11

12 FURTHER EXAMINATION

13 BY MR. MCKAY:

14 Q. This is testimony, by the way. This is you  
15 saying what you know. This can't be you saying what you  
16 think might possibly have happened.

17 Do you understand that?

18 A. Okay.

19 Q. Okay.

20 So you know that you were never in the  
21 vicinity of the child when he wasn't being questioned by the  
22 police; you've told me that already, right?

23 A. By the police, yeah.

24 Q. By the police, okay.

25 So if you were never around the child when

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

109

1 the child wasn't being questioned by the police --

2 A. Yes.

3 Q. -- then the only time you were around the  
4 child was when the child was being questioned by the police,  
5 right?

6 A. No. I recall the father was escorted out of  
7 the jet bridge by the police while the son was sitting at  
8 the end of the jet bridge with other agents around him.

9 Q. Which end?

10 A. Where the jet bridge meets the aircraft.

11 Q. And you say "with other agents around him."  
12 Agents of what?

13 A. I can't recall if it was a flight attendant  
14 or another gate agent.

15 Q. But there were no police present?

16 A. They were present. They weren't interviewing  
17 him at the time.

18 Q. And is it your testimony that you were  
19 listening to the child talking at that point?

20 A. Once again, I can't recall if I heard it from  
21 the agent or from when the child was speaking to an agent.

22 Q. Okay.

23 So that's the important distinction. Are you  
24 testifying here under oath that you heard the child making  
25 statements?

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

110

1           A.       I heard the child speaking. But that one  
2 particular statement, once again, I cannot recall if that  
3 was hearsay or directly from the child at that point.

4           Q.       Okay.

5                   And so you cannot say under oath that you  
6 heard the child saying that he had been separated before?

7           MR. MAYE: Object to form.

8           THE WITNESS: That's correct. Not directly from the  
9 child. Not 100 percent, no.

10 BY MR. MCKAY:

11           Q.       You cannot say that. You have to testify  
12 about what you know. And you do not know that you heard it  
13 from the child, right?

14           A.       I do not know if I heard it from the child,  
15 correct.

16           Q.       Okay. All right.

17           MR. MCKAY: So this is the end of the deposition  
18 and --

19           MR. MAYE: I'm sorry, John. I want to follow up  
20 here --

21           MR. MCKAY: All right.

22           MR. MAYE: -- because, obviously, you just went  
23 through that. So I have a right to --

24           MR. MCKAY: I was here when it happened.

25           ////

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

111

## 1 FURTHER EXAMINATION

2 BY MR. MAYE:

3 Q. So, Angelica, on this last point of how you  
4 learned that the child said "This was not the first time  
5 this has happened," it's possible that you heard it from the  
6 child when he spoke to or told either the flight attendant  
7 or gate agent, correct?

8 A. Correct.

9 MR. MCKAY: Objection to the form of the question  
10 and it conflicts with her prior testimony.

11 MR. MAYE: No, that's not true, John. It doesn't  
12 conflict. It doesn't conflict.

13 MR. MCKAY: She just testified that she cannot  
14 testify that she heard it from the child. So now you're  
15 trying to spin that as "Is it possible that you did."

16 MR. MAYE: No, no.

17 MR. MCKAY: That is speculation.

18 MR. MAYE: Nope --

19 MR. MCKAY: You cannot ask the witness to  
20 speculate.

21 MR. MAYE: Whatever, John.

22 MR. MCKAY: Yeah, whatever. That's the law. That's  
23 what you learn in law school.

24 MR. MAYE: Okay.

25 MR. MCKAY: So I don't want you to testify about

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

112

1       possibilities because anything is possible, right? There  
2       might be a God. There might be things -- you know, there  
3       might be ghosts, right?

4                     But we have to testify about what you  
5       observed when the plane landed. And we have to know the  
6       truth because this may be the only time that we get to talk  
7       to you, and we can't leave here hearing about what you think  
8       might be possible because that's not what we are here for.

9                     We are here to learn about what you observed.  
10      And I need to make this perfectly clear, and I need to hear  
11      it from you.

12                   Did you hear the child with your own ears --  
13      did you hear the child say "This has happened to us before,"  
14      "yes" or "no"?

15                   MR. MAYE: Object to form.

16                   MR. MCKAY: That's all you need to say. Thank you.

17                   THE WITNESS: I can't say for sure I heard it  
18      directly from the child.

19                   MR. MCKAY: Thank you very much. All right.

20                   Now, the court reporter has made notes of  
21      what happened today and is going to -- and they are very  
22      good notes, by the way.

23                   She is going to turn this into a transcript,  
24      and the transcript can be printed out and you can review it,  
25      if you'd like to proofread it, and make sure everything is

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

113

1 correct, or you can tell her today that you're comfortable  
2 with her printing it up without you proofreading it.

3                   But we need to know before you sign off today  
4 which you prefer.

5                   THE WITNESS: I'm comfortable with it.

6                   MR. MCKAY: You're comfortable with waiving?

7                   THE WITNESS: I suppose so, yes.

8                   MR. MCKAY: Okay. That's all we have.

9                   Thank you very much. I appreciate you taking  
10 the time.

11                  THE WITNESS: You're welcome.

12                  MR. MAYE: Thank you, Angelica.

13                  THE WITNESS: Thank you.

14                  THE VIDEOGRAPHER: And if, Counsel, John and Brian,  
15 if you can just briefly stay on the record so I can get your  
16 video orders down, please.

17                  MR. MCKAY: Angelica, you're free to leave.

18                  THE COURT: Counsel McKay, did you want a copy?

19                  MR. MCKAY: Yeah. Like I told you before, only  
20 electronic.

21                  THE VIDEOGRAPHER: Of the video?

22                  MR. MCKAY: Of the video, yes. Yeah, I think an  
23 electronic copy the video.

24                  THE VIDEOGRAPHER: Okay. Sure.

25                  And then, Counsel Maye, did you want a copy

ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

114

1 of the video?

2 MR. MAYE: Yes, please.

3 THE COURT: Synced to your transcript?

4 MR. MAYE: No, not necessary.

5 THE VIDEOGRAPHER: Just DVD. Okay. All right.

6 This concludes today's videoconference  
7 deposition of Angelica Paulo. We are going off the record  
8 on March 15th, 2022 and the time is 12:44 p.m. Pacific time.

9 Thank you, everybody.

10 (REVIEW AND SIGNATURE WAIVED BY DEPONENT.)

11 (PROCEEDINGS ADJOURNED AT 12:44 P.M.)

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ANGELICA PAULO  
PETER DELVECCHIA vs FRONTIER AIRLINES

March 15, 2022

115

1 REPORTER'S CERTIFICATE

2 STATE OF NEVADA )  
3 ) ss.  
4 COUNTY OF CLARK )

5 I, Robin A. Ravizé, a Certified Shorthand Reporter  
6 in Clark County, State of Nevada, do hereby certify:

7 That I reported the taking of the deposition of  
8 Angelica Paulo on March 15, 2022, commencing at the hour of  
9 10:06 a.m.;

10 That prior to being examined, the witness was by  
11 me duly sworn to testify to the truth, the whole truth, and  
nothing but the truth;

12 That I thereafter transcribed my said shorthand  
13 notes into typewriting and that the typewritten  
14 transcription of said deposition is a complete, true, and  
15 accurate transcription of my said shorthand notes taken down  
16 at said time; and that review of the transcript was not  
17 requested.

18 I further certify that I am not a relative nor  
19 employee of an attorney or counsel involved in said action,  
20 nor a person financially interested in said action.

21 IN WITNESS WHEREOF, I have hereunto set my hand in  
22 my office in the County of Clark, State of Nevada this  
23 31st day of March, 2022.



24 Robin A. Ravizé, CCR No. 753  
25



**PASSENGER PNR DETAILS FOR E95Z4G**

**DOT Compliant #:** -

**DOT Analyst:** -

\*All time displayed in this PNR portal are in Mountain Time(MT)

**SUMMARY**

| PNR    | Booking Channel | Booking Date | Total Amount Paid | Voucher Issued |
|--------|-----------------|--------------|-------------------|----------------|
| E95Z4G | Navitaire       | 02/28/2019   | \$702.08          | \$0.00         |

**PASSENGERS & FLIGHTS**

| First Name | Last Name    | Date Of Birth | Gender | Segment Number | Flight Number | Seat | Departure Date | Departure Station | Arrival In Location | Check In Date | Check In Time | Check Out Date | Check Out Time | Time Of Departure | Boarding Status | Arrival Station | Arrival Date | Time Of Arrival |
|------------|--------------|---------------|--------|----------------|---------------|------|----------------|-------------------|---------------------|---------------|---------------|----------------|----------------|-------------------|-----------------|-----------------|--------------|-----------------|
| [REDACTED] | [REDACTED] a | 04/07/1993    | Male   | 1              | 2066          | 13F  | 04/03/2019     | LAS               | LAS                 | 04/03/2019    | 09:00 AM      | 12:50          | 09:00 AM       | Boarded           | RDU             | 05:04 AM        |              |                 |
| [REDACTED] | [REDACTED] a | 04/07/1993    | Male   | 1              | 2066          | 13E  | 04/03/2019     | LAS               | LAS                 | 04/03/2019    | 09:00 AM      | 12:50          | 09:00 AM       | Boarded           | RDU             | 05:04 AM        |              |                 |
| [REDACTED] | [REDACTED] a | 04/07/1993    | Male   | 1              | 2067          | 13E  | 03/28/2019     | RDU               | RDU                 | 03/27/2019    | 07:48 PM      | 05:59 PM       | 05:59 PM       | Boarded           | LAS             | 11:27 PM        |              |                 |
| [REDACTED] | [REDACTED] a | 04/07/1993    | Male   | 1              | 2067          | 13D  | 03/28/2019     | RDU               | RDU                 | 03/27/2019    | 07:48 PM      | 05:59 PM       | 05:59 PM       | Boarded           | LAS             | 11:27 PM        |              |                 |

**BOOKING CONTACT**



| First Name | Last Name | Email Address           | Home Phone | Other Phone                |
|------------|-----------|-------------------------|------------|----------------------------|
| peter      | deVecchia | p[REDACTED]@h[REDACTED] | [REDACTED] | 91[REDACTED]-2[REDACTED]35 |

#### BOOKING COMMENTS

| Created Agent Name | Created Agent Id | Created Agent Code | Created Date | Created Time | Comment                                                                                                                                                                                                                 |
|--------------------|------------------|--------------------|--------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| AppSupport MassPNR | 7822380          | MassPNR            | 03/25/2019   | 08:08 AM     | Email sent to p[REDACTED]@h[REDACTED]<br>72 Hour Pre-Flight                                                                                                                                                             |
| AppSupport MassPNR | 7822380          | MassPNR            | 03/27/2019   | 07:20 PM     | Email sent to pet[REDACTED]M[REDACTED]<br>24 Hour Pre-Flight                                                                                                                                                            |
| Jakita Floyd       | 8421678          | cx91993573         | 03/28/2019   | 04:41 PM     | pax checked one bag<br>but would like a refund<br>for the other                                                                                                                                                         |
| Lawrence Caravalho | 4764578          | wf971730           | 03/28/2019   | 08:06 PM     | Called Leo Police per<br>SOC, SCSM, separated<br>An[REDACTED] from Peter found<br>inappropriate touching<br>from Peter To [REDACTED]<br>Leo has been called to<br>meet the flight.                                      |
| ANGELICA PAULO     | 3077967          | 760576             | 03/29/2019   | 02:05 AM     | Metro met inbound fit<br>2067. Per FA, all crew<br>members witnessed<br>inappropriate touching<br>of minor child. FB<br>witnessed touching of<br>thighs. Father was<br>escorted away by metro<br>separate from child to |



|                      |         |           |            |                                                                                                                                                                                                                                                                                                                       |
|----------------------|---------|-----------|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |         |           |            | police station. Per child, this was not the first incident that they have been separated in this manner. Checked luggage pulled and held in BSO.                                                                                                                                                                      |
| AppSupport MassPNR   | 7822380 | MassPNR   | 04/03/2019 | 02:21 AM<br>Email sent to [REDACTED]<br>[REDACTED] 24 Hour Pre-Flight                                                                                                                                                                                                                                                 |
| Claudette Patero     | 7608248 | SI1106711 | 04/03/2019 | 06:29 PM<br>Peter called in due to the incident that happened for their flight// accrding to pax he is currently in the Metro and will be filling a complaint against frontier for what happened// advised to transfer the call to Customer Relations//                                                               |
| Kathia Robles Cabral | 7163853 | csu120785 | 04/03/2019 | 07:03 PM<br>***pax is uncomfortable flying with the flight attendant - Kevin. if he is on this flight please accomodate the pax and courtesy change him to a different flight home on a flight kevin is not on. *** phone call notes: pulled out from the flight bc he was accused that he was holding his son wrong, |



|                    |         |         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------|---------|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                    |         |         | he says that this was a racist act, he is filing a law suit. he is in the metro, FBI told him to file a complaint with us.                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                    |         |         | attendant and is currently working with the police department. fell asleep and someone took his son to the back of the plane, said that they accused him to inappropriately touching his son. flight attendant mocked him, him and his son were both questioned by the FBI. does not want to take the flight back home with the same flight attendant. flight attendants name was Kevin and he is 5'10 about 30. was screaming at him then put his hands on his sons crotch area to explain to him how he was holding his son. He does not want to ta |
| AppSupport MassPNR | 7822380 | MassPNR | 04/04/2019<br>09:02 AM<br><br>Email sent to [REDACTED] PostFlight                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |



|                        |         |           |            |          |                                             |
|------------------------|---------|-----------|------------|----------|---------------------------------------------|
| Daniela Cruz Velasquez | 5364601 | SI1035818 | 04/16/2019 | 12:48 PM | CALLED TO CHECK THE STATUS OF HER COMPLAINT |
| Daniela Cruz Velasquez | 5364601 | SI1035818 | 04/16/2019 | 12:51 PM | TRANSFER TO CR DEPARTMENT                   |

#### RECORD HISTORY

| Created Date | Created Time | History Code | Detail                                                                                                           | Employee Number | Station |
|--------------|--------------|--------------|------------------------------------------------------------------------------------------------------------------|-----------------|---------|
| 02/28/2019   | 06:59 AM     | IS           | 2<br>2/28/2019 13:59:42                                                                                          | Website         | WWW     |
| 03/27/2019   | 07:48 PM     | AB           | 0 0422594475 0 1 LAS<br>2067 False peter<br>delvecchia F9                                                        | Website         | WWW     |
| 03/27/2019   | 07:48 PM     | AB           | 0 0422594476 0 1 LAS<br>2067 False a [REDACTED]<br>[REDACTED] F9                                                 | Website         | WWW     |
| 03/27/2019   | 07:48 PM     | CI           | 3/28/2019 19:59:0<br>3/28/2019 19:59:0<br>3/28/2019 22:27:0 RDU<br>LAS F9 2067 13E peter<br>delvecchia delvec 32 | Website         | WWW     |
| 03/27/2019   | 07:48 PM     | CI           | 3/28/2019 19:59:0<br>3/28/2019 19:59:0<br>3/28/2019 22:27:0 RDU<br>LAS F9 2067 13D<br>33                         | Website         | WWW     |
| 03/27/2019   | 07:48 PM     | BP           | 3/28/2019 19:59:0<br>3/28/2019 19:59:0                                                                           | Website         | WWW     |



|            |          |    |                                                                                                                  |                   |
|------------|----------|----|------------------------------------------------------------------------------------------------------------------|-------------------|
|            |          |    | 3/28/2019 22:27:0 RDU<br>LAS F9 2067 13E peter<br>delvecchia delvec 32                                           |                   |
| 03/27/2019 | 07:48 PM | BP | 3/28/2019 19:59:0<br>3/28/2019 19:59:0<br>3/28/2019 22:27:0 RDU<br>LAS F9 2067 13D<br>[REDACTED] 33              | Website<br>www    |
| 03/28/2019 | 04:41 PM | RB | 87923445 0422594476<br>0 1 LAS 2067 False<br>[REDACTED] [REDACTED] F9                                            | CX91993573<br>RDU |
| 03/28/2019 | 04:41 PM | CB | 87923444 0422594475<br>0 1 LAS 2067 False<br>peter delvecchia F9                                                 | CX91993573<br>RDU |
| 03/28/2019 | 04:41 PM | BT | 3/28/2019 0:0:0 F9<br>2067 peter delvecchia<br>0422594475 LAS 0<br>Pounds                                        | CX91993573<br>RDU |
| 03/28/2019 | 05:27 PM | BD | 3/28/2019 19:59:0<br>3/28/2019 19:59:0<br>3/28/2019 22:27:0 RDU<br>LAS F9 2067 13E peter<br>delvecchia delvec 32 | CX91928596<br>RDU |
| 03/28/2019 | 05:27 PM | BD | 3/28/2019 19:59:0<br>3/28/2019 19:59:0<br>3/28/2019 22:27:0 RDU<br>LAS F9 2067 13D<br>[REDACTED] [REDACTED] 33   | CX91928596<br>RDU |
| 03/29/2019 | 02:05 AM | CC | P<br>[REDACTED]<br>919 [REDACTED]<br>27278 US US en-US                                                           | 760576<br>LAS     |



|            |          |    |                                                                                                                    |          |
|------------|----------|----|--------------------------------------------------------------------------------------------------------------------|----------|
|            |          |    | 2 0 P<br>pe [REDACTED]<br>9 [REDACTED] 27278 US US<br>[REDACTED] 5 2 0                                             |          |
| 04/03/2019 | 09:03 PM | CB | 0 0422805973 0 1 RDU<br>2066 False peter<br>delvecchia F9                                                          | WF973505 |
| 04/03/2019 | 09:03 PM | AB | 0 0422805973 0 1 RDU<br>2066 False peter<br>delvecchia F9                                                          | WF973505 |
| 04/03/2019 | 09:03 PM | CI | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:4:0 LAS RDU<br>F9 2066 13F peter<br>delvecchia delvec 118       | WF973505 |
| 04/03/2019 | 09:03 PM | CI | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:4:0 LAS RDU<br>F9 [REDACTED] 13F a [REDACTED]<br>[REDACTED] 119 | WF973505 |
| 04/03/2019 | 09:03 PM | BP | 4/3/2019 23:50:0<br>4/4/2019 7:4:0 LAS RDU<br>F9 2066 13F peter<br>delvecchia delvec 118                           | WF973505 |
| 04/03/2019 | 09:03 PM | BP | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:4:0 LAS RDU<br>F9 2066 13F peter<br>delvecchia delvec 118       | WF973505 |



|            |          |    |                                                                                                                    |          |     |  |  |
|------------|----------|----|--------------------------------------------------------------------------------------------------------------------|----------|-----|--|--|
|            |          |    |                                                                                                                    |          |     |  |  |
| 04/03/2019 | 09:03 PM | BP | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:40 LAS RDU<br>[REDACTED] 13E [REDACTED]<br>[REDACTED] 119       | WF973505 | LAS |  |  |
| 04/03/2019 | 09:03 PM | BP | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:40 LAS RDU<br>F9 2066 13E [REDACTED]<br>d [REDACTED] 119        | WF973505 | LAS |  |  |
| 04/04/2019 | 12:12 AM | BD | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:40 LAS RDU<br>F9 2066 13F peter<br>delvecchia delvec 118        | WF988536 | LAS |  |  |
| 04/04/2019 | 12:12 AM | BD | 4/3/2019 23:50:0<br>4/3/2019 23:50:0<br>4/4/2019 7:40 LAS RDU<br>F9 2066 [REDACTED] a [REDACTED]<br>[REDACTED] 119 | WF988536 | LAS |  |  |
|            |          |    |                                                                                                                    |          |     |  |  |

**RNT**

| Reference Number | Created Date | Created Time | Modified Date | Modified Time | Resolution                                                                                  | Verbatim                                                              | Comment Text                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|------------------|--------------|--------------|---------------|---------------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 190403-000748    | 04/03/2019   | 01:13 PM     | 05/04/2019    | 05:13 PM      | "4/3/2019- Kathia filing a complaint about the flight attendant Kevin, outside of frontiers | "pax called in to complain about a flight attendant, he wants further | "From:Grimes, Jason B. &lt;[REDACTED]&gt;<br>Sent:Thursday, April 18, 2019 5:50 AMTo:Anderson, Matthew [REDACTED] &lt;[REDACTED]&gt;; Infight Dia MGR &lt;[REDACTED]&gt;; Subject:RE: Passenger Complaint - 3/28/19 - F9 2067 RDU-LAS - Pax in 13D, 13E Hello Matthew, I have the following responses for this complaint. Hello, My story: As the C, I went to brief the exit row before MCD closed. As I briefed I noticed a boy sitting in the exit row. I had asked him |



|                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>liability, will put a note on his reservation and say that he is uncomfortable with Kevin that we can courtsay move the pax to a flight he is not on. when boarding advise him to ask the agent to look at his reservation notes we were able to figure out a way to find out what flight attendants are working the flight, there is no Kevin on this upcoming flight, however, still making the not under his reservation."</p> | <p>"together" Because it was a full flight, I had asked for two volunteers sitting next to each other to move to the exit row. A man and a woman had volunteered (17E, if I am remembering correctly). After the switch was made, I briefed the new passengers sitting the the exit row and headed to the back of the aircraft to notify the B and the D flight attendant that I had moved people out of the aircraft because of age requirement. The B and the D flight attendant was shocked as I said age instead of language. The little boy did not look 12, and the relationship they had looked very awkward. I did not interact with either the man or the boy after that. The B and the D flight attendant had dealt with most of it since the boy and the man was sitting in their section. — Anna Bond [REDACTED] When the C briefed the exit row, she noticed a child in the row. He said he was 12 years old. He was black. When she began to find him a new seat, an older white man, early 50s, says "This is my son." She moved them to row 17 E and F. While doing service and trash, about 25 minutes into the flight, the A, C and D flight attendants noticed the older man rubbing the boys face in a way that made them uncomfortable. They asked me to check it out. As I walked from the front to the rear, I noticed the man's hand on the boy's crotch. I walked back up to the front again and his hand was still there. Both appeared to be sleeping. We informed the captain and he told us to separate the two. I put the boy in row 31F (and placed an ABP in 31D) and left the older man in 17. I spoke with the boy and he said that was his dad. He was adopted when he was three. And that they have been separated before on another flight. He asked could he go back and sit by his dad. I asked him if he knew that his dad's hand was on his crotch. He said no. It took about 10-12 minutes after I separated them for the dad to come to the back and see what was going on. I told him I saw where his hand was and that's why you were separated. The man asked me "did he tell you where my hand was?" I told him "no, I saw it"</p> | <p>investigation to be done about this situation."</p> | <p>how old he was to make sure he is 15 or older. He had answered "12" I asked him if he was traveling on his own and he pointed at a man sitting next to him. (The boy was in 13E the man was in 13D). I had asked the gentleman sitting in 13D if he wanted me to separate them move them together since the boy is not allowed to sit in the exit row because of the age requirement. The man had answered</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



myself&quot;. He spoke to the boy briefly, asked if he was alright, and went back to his seat. He did not come check on the boy for the remaining 3+ hours of the flight. He also deplaned without waiting for the boy to come up from the last row. Jason Grimes Jason Grimes ORD inflight Supervisor p. 773.985.0718

Grant [REDACTED] Sent:Wednesday, April 17, 2019 11:56 AM To:Anderson, Matthew [REDACTED] From:Gahm, [REDACTED]

& [REDACTED] &gt;Subject:RE: F9 2067 - 3/28/19 - RDU-LAS - Law Enforcement Called Matthew, I don't have anything beyond this other than knowing that FBI did not arrest the person nor are there likely to be any charges filed. I can reach out to the FBI in LAS and ask them if there is anything further but honestly, I don't think there is or they would have been in touch. I'll ask Inflight if they have anything further but the initial response is that the FA's acted appropriately. That being said, we really wouldn't give the pax any more information than what they already know and yes, if he wants more, then yes, he needs to contact law enforcement. I'm certain that they gave him their contact. Grant Gahm Security Operations; Alternate AOSC \*\*\*From:Anderson, Matthew Sent:Wednesday, April 17, 2019 10:55 AM To:Gahm, Grant [REDACTED] & [REDACTED] &gt;Cc:Jenkins, Joy [REDACTED] &gt;Subject:F9 2057 - 3/28/19 - RDU-LAS - Law Enforcement Called Hi Grant – A gentleman involved in an incident on the above flight reached out complaining about his treatment on-board, alleging that it was discrimination. From what I could gather based on notes found and the pIR, the flight attendant's witnessed what they determined to be inappropriate touching of a child by the adult – and called for police to meet the aircraft upon landing. The call notes indicate that the FBI was involved. I'm not exactly sure what the passenger is specifically reaching back out for – but a previous email from a customer relations agent indicated that an investigation would be conducted – so I suspect the passenger wants to know the results of the investigation. Would we have any details regarding this incident, and is there anything we can share with the passenger? Or is it best to refer the passenger to law enforcement for any updates? Matthew



Anderson Customer Relations Advocate  
 [REDACTED]

"From:Anderson, Matthew Sent:Wednesday, April 17, 2019 10:37  
 AMTo:Inflight DIA MGR  
 &lt;[REDACTED]&gt;Subject:Passenger

Complaint - 3/28/19 - F9 2067 RDU-LAS - Pax in 13D, 13E Hi In-flight-Hoping we could gather some statements from the crew in regards to this one – I found a PIR, but no associated cabin submitters – but there's some notes in the reservation that the FA's witnessed inappropriate touching between these two passengers (adult + child). Could we get statements from all the FA's that witnessed the event as to what they saw? Passenger is alleging that this was done because he is white and his child is black – although I'm confident that is not the case given the gravity of what the FA's said they saw – and that they took action in the interest of the child. Any information we can gather, including witness statements if we have them, is greatly appreciated. I'll include the call recap below from our CR agents. Call 1: pulled out from the flight bc he was accused that he was holding his son wrong, he says that this was a racist act, he is filing a law suit, he is in the metro, FBI told him to file a complaint with us, filing a complaint with us due to the flight attendant and is currently working with the police department, fell asleep and someone took his son to the back of the plane, said that they accused him to inappropriately touching his son, flight attendant mocked him, him and his son were both questioned by the FBI, does not want to take the flight back home with the same flight attendant. Call 2: spoke to FBI about it, interviewed 8 ppl sitting around. Some ppl saw a guy get punched in the back of the neck during flight. He is having health problems. FLB charged it as racist incident. Son is black and white, adopted flight attendant put hand on sons crotch to demonstrate what happened. Flight attendant separated pax and his son because FA say pax holding his son incorrectly and "touching his crotch"; Pax had fell asleep on the plane and was woken by being hit on the back of the head 4 times by flight attendant. Then flight attendant separated them and demonstrated how pax was touching kids crotch by touching the kids crotch again. Skyspeed comments mention all attendants say inappropriate touching. Skyspeed comments



mention that the child mentioned they have been separated before for similar incident. Matthew Anderson Customer Relations

For similar incident, Matthew Anderson Customer Relationship Advocate

message is important to us and is being reviewed in the order it was received. A specialist will respond as soon as possible. " spoke to FBI about it, interviewed 8 ppl sitting around. Some ppl saw a guy get punched in the back of the neck during flight. He is having health problems. FBL charged it as racist incident. Son is black and white, adopted. flight attendant put hand on sons crotch to demonstrate what happened. Flight attendant separated pax and his son because FA say pax holding his son incorrectly and "touching his crotch&quot; Pax had fell asleep on the plane and was woken by being hit on the back of the head 4 times by flight attendant. Then flight attendant separated them and demonstrated how pax was touching kids crotch by touching the kids crotch again. Skyspeed comments mention all attendants say inappropriate touching. Skyspeed comments mention that the child mentioned they have been separated before for similar incident. Send to Denver team, and send email including details. ""Hello Peter, Thank you for reaching out to Frontier Airlines with your concerns onboard the aircraft on March 28, 2019 when traveling from Raleigh Durham to Las Vegas. We are sorry to hear about the experience you encountered with one of our flight attendants. Frontier has zero tolerance for discrimination in any form, indeed we strive to create an atmosphere of mutual respect among employees and our guests. We have a well deserved reputation of delivering a consistently high level of service to our customers. I'm very sorry if this was not your experience. Based on the information provided, we don't feel the described behavior was based on discrimination or prejudice, however, we do take any claim of this nature very seriously. We assure you an investigation into the events and interactions you described will be conducted. While all communications, both verbal and written, between Frontier Management and our employees are necessarily proprietary, be assured an internal investigation will be handled to conclusion. Thank you for bringing this to our immediate attention. Regards,

Kathia Frontier Airlines



\*\*\*\*\* P.S. We want your feedback! Please fill out our survey and you will be entered to win 2 FREE round-trip tickets on Frontier Airlines up to a value of \$400. Click the link to take the survey:

<https://www.surveymonkey.com/r/5LJKB2K>

\*\*\*\*\* "" pulled out from the flight bc he was accused that he was holding his son wrong, he says that this was a racist act, he is filing a law suit, he is in the metro, FBI told him to file a complaint with us, filing a complaint with us due to the flight attendant and is currently working with the police department. fell asleep and someone took his son to the back of the plane, said that they accused him to inappropriately touching his son, flight attendant mocked him, him and his son were both questioned by the FBI. does not want to take the flight back home with the same flight attendant. flight attendants name was Kevin and he is 5&#39;10 about 30. was screaming at him then put his hands on his sons crotch area to explain to him how he was holding his son. He does not want to take this flight with this flight attendant and want to be put on a different airline to avoid the situation. pax advised that the flight attendant took his son, he really wants some investigating outside of frontiers liability, will put a note on his reservation and say that he is uncomfortable with Kevin that we can courtesy move the pax to a flight he is not on, okayed by sup Willow. when boarding advise him to ask the agent to look at his reservation notes we were able to figure out a way to find out what flight attendants are working the flight, there is no kevin on this upcoming flight, however, still making the not under his reservation. if pax fights further, I will be sending this to denver team assist, as was advised by willow. "

### FARE

| First Name | Last Name  | Charge Type | Charge Amount |
|------------|------------|-------------|---------------|
| peter      | delvecchia | FarePrice   | \$125.00      |



|            |            |                   |          |
|------------|------------|-------------------|----------|
| peter      | delvecchia | IncludedTravelFee | \$8.72   |
| peter      | delVecchia | TravelFee         | \$19.00  |
| peter      | delvecchia | TravelFee         | \$5.60   |
| peter      | delvecchia | TravelFee         | \$4.20   |
| peter      | delvecchia | TravelFee         | \$4.50   |
| peter      | delvecchia | FarePrice         | \$44.00  |
| peter      | delvecchia | IncludedTravelFee | \$3.07   |
| peter      | delvecchia | TravelFee         | \$19.00  |
| peter      | delvecchia | TravelFee         | \$5.60   |
| peter      | delvecchia | TravelFee         | \$4.50   |
| peter      | delvecchia | TravelFee         | \$4.20   |
| [REDACTED] | [REDACTED] | FarePrice         | \$125.00 |
| [REDACTED] | [REDACTED] | IncludedTravelFee | \$8.72   |
| [REDACTED] | [REDACTED] | TravelFee         | \$19.00  |
| [REDACTED] | [REDACTED] | TravelFee         | \$5.60   |
| [REDACTED] | [REDACTED] | TravelFee         | \$4.20   |
| [REDACTED] | [REDACTED] | TravelFee         | \$4.50   |
| [REDACTED] | [REDACTED] | FarePrice         | \$44.00  |
| [REDACTED] | [REDACTED] | IncludedTravelFee | \$3.07   |
| [REDACTED] | [REDACTED] | TravelFee         | \$19.00  |



|            |            |           |        |
|------------|------------|-----------|--------|
| [REDACTED] | [REDACTED] | TravelFee | \$5.60 |
| [REDACTED] | [REDACTED] | TravelFee | \$4.50 |
| [REDACTED] | [REDACTED] | TravelFee | \$4.20 |

**ANCILLARY**

| First Name | Last Name  | Charge Code | SSRCode | Charge Amount |
|------------|------------|-------------|---------|---------------|
| peter      | delvecchia | PBNDL       |         | \$0.00        |
| peter      | delvecchia | PBNDL       |         | (\$115.44)    |
| [REDACTED] | [REDACTED] | PBNDL       |         | \$0.00        |
| [REDACTED] | [REDACTED] | PBNDL       |         | (\$115.44)    |

**PAYMENT**

| Payment Method Type | Payment Method | Account Number(Last 4-digits) | Account Name     | Payment Amount |
|---------------------|----------------|-------------------------------|------------------|----------------|
| External/Account    | Visa           | 7103                          | peter delvecchia | \$702.08       |

**BAG**

| Baggage ID | Check In Time |
|------------|---------------|
| 88128350   | 09:03 PM      |
| 87923444   | 07:48 PM      |



87923445

07:48 PM

**RETURNING CUSTOMERS**

| PNR    | Booking Date |
|--------|--------------|
| MYZGSG | 05/01/2018   |